

# Privacy Policy

## 1. Purpose

Move Academy is committed to the Australian Privacy Legislation and this policy describes how Move Academy will comply with the Commonwealth Privacy Act 1988, the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Data Provision Requirements 2012 and National Privacy Principles in the way it's collects, uses, secures and discloses personal information.

## 2. Definitions

The Act refers to the Higher Education Support Act 2003

Privacy Act refers to Privacy Act 1988 (Cth)

## 3. Scope

This statement applies to any personal information collected from you by Move Academy Pty Ltd via one of the websites owned or operated by us, or websites within our network, or related third party promotional partners. This statement does not apply to the practices of organisations that we do not own or control or to people that we do not employ or oversee even if links to their websites appear on our Promotional Platforms. We recommend you examine the privacy policies and statements of such other parties. In order to provide training and assessment services, Move Academy lawfully collects personal information from staff and clients that is necessary both for appropriate marketing and promotional information to be sent to potential clients; and for the business to function.

We understand the importance of protecting the privacy of an individual's personal information. This statement sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, hold, use and disclose your personal information.

In handling your personal information, we will comply with the Data Provision Requirements of 2012, the Privacy Act 1988 and with the thirteen Australian Privacy Principles in the Privacy Act.

This policy statement may be updated from time to time.

## 4. Policy

In the course of its business, Move Academy may collect information from you either electronically, or in hard copy format, including information that personally identifies individuals. Move Academy may also record various communications between individuals and itself. We are subject to the operation of the Privacy Act 1988 (Cth) (Privacy Act). This policy explains how we handle personal information relating to individuals, so as to ensure we meet our obligations under the Act.

By electing to acquire our services, you will be deemed to consent to us using your personal information in a manner consistent with this privacy policy, including monitoring your use of our website, learning platforms and promotional platforms. Move Academy only collects personal information from individuals by fair and lawful means as far as is necessary for the functions of Move Academy, and to comply with any relevant regulatory requirements.

We only collect personal information to the extent that this is reasonably necessary for one or more of our functions or activities.

This includes the following kinds of information:

- current and past name(s);
- contact details such as your address, your email address, your telephone number and other contact details;
- age or date of birth;
- information we require to carry out a financial assessment such as your marital Status, Number of dependants, your income and expenses, and employment history;
- information about your education course and enrolment;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information.
- Information you provide to us through customer surveys; and
- Any other personal information that may be required in order to facilitate your dealings with us

Purposes for which we may collect personal information include, but are not limited to:

- to identify you and verify that your information is correct
- to identify and inform you about a product or service that we think maybe of interest to you.
- to operate, protect, improve and optimise our website, app, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to communicate effectively with you throughout the duration of your learning and assessment
- to be able to issue any certification documentation, and enable efficient course administration including maintenance of proper academic records
- to assess entitlement for Government funding
- to assist in any application by you for credit with a third-party credit provider
- to report to relevant government agencies as required by legislation
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

If an individual chooses not to give Move Academy certain information, Move Academy may be unable to enrol that person in a course or program or supply them with appropriate support.

## Disclosure of personal information

As a general rule, we will not use or disclose personal information for the purposes other than those connected with the primary purpose of collection, or a reasonably related secondary purpose which we believe you should reasonably expect.

Secondary purposes might include disclosure of an individual's details to organisations that run courses / require data in conjunction with Move Academy Personal information about your studies with Move Academy may be shared with the Australian Government and designated authorities, including but not limited to;

- the Australian Skills Quality Authority (ASQA),
- the Department of Education and Training
- the National Centre for Vocational Education Research Ltd (NCVER)
- Commonwealth and the VET Student Loans Tuition Protection Director

This information includes personal and contact details, course and unit enrolment details and changes.

Move Academy does not disclose an individual's personal information to another person or organisation unless:

- The individual concerned is reasonably likely to have been aware, or made aware that information of that kind is usually passed to that person or organisation, or
- the individual concerned has given written consent to the disclosure, or
- Move Academy believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person, or
- the disclosure is required or authorised by or under law, or
- the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of the public revenue, Move Academy includes in the record containing that information a note of the disclosure.

Move Academy only discloses information to an overseas recipient if that disclosure relates to providing the product or service as promised, for administrative or other business management purposes or where you have provided your consent to us disclosing your personal information to a specified third party promotional partner that is located overseas. Move Academy takes all reasonable steps to ensure that any overseas recipient complies with the Australian Privacy Principles.

Any person or organisation that collects information on behalf of Move Academy or to whom personal information is disclosed as described in this procedure is required to not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

## Australian Privacy Principles

Privacy Act 1988 provides for the protection of an individual's personal information. 13 Australian Privacy Principles (APP) came into effect in March 2014. Both the APPs and the APP guidelines apply to any organisation or agency the Privacy Act covers. The Privacy Act covers Australian Government agencies and organisations with an annual turnover of more than \$3 million, and some other organisations. Move Academy acts in accordance with the APP;

### APP 1 - Open and transparent management of personal information

**Document Name:** VSL - privacy policy  
**Revision:** 1.0  
**Revision Date:** 21 May 2021  
**Review Date:** 21 May 2022

**Created By:** RTOADM  
**Approved By:** RTOADM  
**Document Location:** NovaCore CMS\DMS\SNR Documents

- APP 2 - Anonymity and pseudonymity
- APP 3 - Collection of solicited personal information
- APP 4 - Dealing with unsolicited personal information
- APP 5 - Notification of the collection of personal information
- APP 6 - Use or disclosure of personal information
- APP 7 - Direct marketing
- APP 8 - Cross-border disclosure of personal information
- APP 9 - Adoption, use or disclosure of government related identifiers
- APP 10 - Quality of personal information
- APP 11 - Security of personal information
- APP 12 - Access to personal information
- APP 13 - Correction of personal information

### **Security and integrity of personal information**

We take all steps reasonable in the circumstances to ensure that the personal information we hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

We will destroy or de-identify personal information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

### **Updates to our Policy**

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website. You may obtain a copy of our current policy from our website or by contacting us on the details below. It is your responsibility to check the website from time to time in order to determine whether there have been any changes.

### **Right to access and correct records**

We take steps reasonable in the circumstances to ensure personal information we hold is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and/or seek correction of your personal information that is collected and held by us.

If at any time you would like to access or correct the personal information that we hold about you, or you would like more information on our approach to privacy, please contact us via the contact details set out below. We will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- you will have to provide proof of identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- you must be reasonably specific about the information you require; and

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- we may charge you a reasonable administration fee, which reflects the cost to us, for providing access in accordance with your request.

If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms. We will also take steps reasonable in the circumstance to endeavour to provide you with access in a manner that meets your needs and our needs.

If you consider your personal information to be incorrect, incomplete, out of date, or misleading, you can request the information be amended.

We will endeavour to respond to your request to access or correct your personal information within 7 days from your request.

### Complaints about an alleged breach of the Australian Privacy Principles

If you believe that we have failed to comply with the credit reporting requirements in Division 3, Part IIIA of the Privacy Act or that Move Academy has breached a Privacy Principle in relation to that individual they may lodge a complaint using Move Academy’s Complaints procedures, which enables students to lodge complaints of a non-academic nature, including complaints about handling of personal information and access to personal records.

If the complaint remains unresolved, the complainant is able to request an external review from an appropriate independent third party / mediator. The National Training Complaints Hotline and website will be able to direct the complainant to the right authority in their state:

Phone: 13 38 73, Monday–Friday, 8am to 6pm nationally <https://www.employment.gov.au/national-training-complaints-hotline>

#### Associated Information

Associated Internal Documents	Grievance Policy Advertising and Marketing Policy Admission and Enrolment Procedure Student Handbook Application form Pre-training review document Move Academy terms and conditions
Related Legislation, Standards, and Codes	Vet Student Loans Act 2016 Vet Student Loans Rules 2016 Standards for Registered Training Organisations 2015 Student Identifiers Act 2014

#### Change History

Version Control	V 1.0	
Change Summary	21 May 2021	Initial document

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