



Privacy Policy	
Category/Business Group	Corporate Services
Published Externally (Yes/No)	Yes
Approver	Chief Executive Officer
Responsible Officer	Head of Legal and Compliance
Contact Officer	Policy and Compliance Officer
Effective Date	1/09/2017
Next Review Date	1/09/2019
Version	2

Policy Approval

Approver	Responsible Officer	Policy Officer
Rob Forage	Theresa Kelly	Theresa Kelly
Date:18/08/2017	Date:15/08/2017	Date:15/08/2017



TABLE OF CONTENTS

1	Background.....	3
2	Purpose.....	3
3	Scope	3
4	Definitions	3
5	Policy Statement.....	6
5.1	UNSW Global functions	6
5.2	Collecting Personal Information	7
5.3	Consent.....	8
5.4	Anonymity and Pseudonymity	10
5.5	Storage, Security and Disposal	10
5.6	Direct Marketing.....	10
5.7	Disclosing Personal Information.....	11
5.8	Privacy Impact Assessment	12
5.9	Data breach response plan and notification	12
5.10	Accessing and correcting Personal Information	12
5.11	Complaints about handling Personal Information.....	13
6	Legal and Policy Framework.....	13
6.1	Responsibilities	13
6.2	Review	14
7	Related Documentation	14
8	Related Policies and Procedures	14
9	Version History	14



1 Background

UNSW Global operates in complex regulatory and privacy compliance regimes established under both the federal and state legislative frameworks.

As a not-for-profit organisation with an annual turnover exceeding \$3 million, UNSW Global falls within the definition of an 'organisation' in the *Privacy Act 1988* (Cth) and is required to comply with that act as an "APP entity".

UNSW Global is also:

- a "related body corporate" of UNSW Sydney as that term is defined by sections 46 and 50 (b) of the *Corporations Act 2001* (Cth); and
- a "controlled entity" of UNSW Sydney, as that term is defined by section 15A of the *University of New South Wales Act 1989* (NSW);
- a "public sector agency" as that term is defined by section 3 (d) of the *Privacy and Personal Information Protection Act 1998* (NSW) (PIPPA) and section 4 (d) of the *Health Records and Information Privacy Act 2002* (NSW) (HRIPA). As such, UNSW Global may be also required to comply with PIPPA and HRIPA.

2 Purpose

The purpose of this policy is to outline:

- the Personal Information handling practices of UNSW Global,
- the way individuals can access their Personal Information to seek the correction of it; and
- how individuals may make a complaint to UNSW Global about the mishandling of their Personal Information.

3 Scope

This Policy applies to:

- all UNSW Global staff working for or on behalf of UNSW Global
- all UNSW Global Students
- School Students undertaking assessments via the UNSW Global Assessments Business Group
- parents or guardians of UNSW Global Students who are under 18 years of age and School Students
- third parties, such as customers, Business Partners and Service Providers of UNSW Global.

4 Definitions

Note: definitions of personal, sensitive and health information in this policy are taken from the *Privacy Act 1988* (Cth).



Australian Privacy Principles (APPs) means the 13 Privacy Principles set out in Schedule 1 of the *Privacy Act 1988* (Cth) which outline how APP entities must handle use and manage personal information.

APP entity means an agency or an organisation, including all private sector and not-for-profit organisations with an annual turnover of more than \$3 million, all private health service providers and some small businesses.

Business Partner means a person who is part of a business partnership, collaboration or similar arrangement with UNSW Global.

Consent means 'express consent or implied consent'. The four key elements of consent are:

- the individual is adequately informed before giving consent
- the individual gives consent voluntarily
- the consent is current and specific, and
- the individual has the capacity to understand and communicate their consent.

CRICOS Code means the Australian Commonwealth Register of Institutions and Courses for Overseas Students.

Direct marketing means the use and/or disclosure of personal information to communicate directly with an individual to promote goods and services. A direct marketer may communicate with an individual through a variety of channels, including telephone, SMS, mail, email and online advertising.

Express consent means consent given explicitly, either orally or in writing. This could include a handwritten signature, an oral statement, or use of an electronic medium or voice signature to signify agreement.

Health Information as defined by the *Privacy Act 1988* (Cth) means:

- a) information or an opinion about:
 - i. the health or a disability (at any time) of an individual; or
 - ii. an individual's expressed wishes about the future provision of health services to him or her; or
 - iii. a health service provided, or to be provided, to an individual; that is also personal information; or
- b) other personal information collected to provide, or in providing, a health service; or
- c) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- d) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

HRIPA means the *Health Records and Information Privacy Act 2002* (NSW)

Information Protection Principles (IPPs) means the 12 Principles set out in Part 2, Division 1 of the PIPPA outlining legal obligations which NSW public sector agencies, statutory bodies, universities and local councils must abide by when they collect, store, use or disclose personal information.



Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the individual and the APP entity.

OAIC means the Office of the Australian Information Commissioner.

Overseas Recipients means a person or entity who is not in Australia or an external Territory, and is not the entity or the individual, and includes UNSW Global Staff in UNSW Global's subsidiary companies located overseas, education agents and UNSW Global Assessment's overseas resellers.

Permitted General Situation has the meaning in section 16B of the *Privacy Act 1988 (Cth)*.

Personal Information as defined by the *Privacy Act 1988 (Cth)* means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

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

Examples of Personal Information include:

- a record which includes an individual's name, address, date of birth, mobile phone number, email address;
- photographs, images, video or audio footage of an individual;
- the fingerprints, blood or DNA samples of an individual.

PIPPA means the *Privacy and Personal Information Protection Act 1998 (NSW)*.

Privacy Laws means the *Privacy Act 1988 (Cth)*, PIPPA and HRIPA.

Privacy Principles means Australian Privacy Principles and/or Information Protection Principles

School Student means a person formally engaged in learning, usually one enrolled in a primary or secondary school.

Sensitive Information is defined in s.6 of the *Privacy Act 1988 (Cth)* to mean:

- a) information or an opinion about an individual's:
 - i. racial or ethnic origin; or
 - ii. political opinions; or
 - iii. membership of a political association; or
 - iv. religious beliefs or affiliations; or
 - v. philosophical beliefs; or
 - vi. membership of a professional or trade association; or
 - vii. membership of a trade union; or
 - viii. sexual orientation or practices; or
 - ix. criminal record;that is also Personal Information; or
- b) Health Information about an individual; or
- c) genetic information about an individual that is not otherwise health information; or
- d) biometric information that is to be used for the purpose of automated biometric
- e) verification or biometric identification; or
- f) biometric templates.



Service Provider means a third party that provides services on behalf of UNSW Global to UNSW Global Students and/ or staff under a written agreement.

UNSW Global Student means a student who is enrolled with UNSW Global or a person who has submitted an application for admission to UNSW Global.

UNSW Sydney means the University of New South Wales (ABN 57 195 873 179).

5 Policy Statement

UNSW Global Pty Ltd is committed to only collect, hold, use and disclose Personal Information that is needed to carry out its functions and activities and to handle the information in accordance with the Privacy Laws and other applicable data protection laws.

It is UNSW Global policy to:

- only collect Personal Information for a lawful purpose, which is directly related to UNSW Global's functions and activities;
- not to collect Health Information or Sensitive Information from an individual unless the individual consents to the collection of the information or unless the collection of the information is required or authorised by or under an Australian law;
- only collect Personal Information directly from the individual concerned, unless the person has authorised collection from someone else, or where the person is under the age of 16, the information has been provided by a parent or guardian;
- inform the person concerned that UNSW Global collects their Personal Information, the reason for collecting the information, how it is going to be used and disclosed (if applicable) and how the person can access and correct the information;
- use all reasonable endeavours to ensure the collected information is relevant, accurate, complete, up to date and not excessive;
- store Personal Information securely and protect it from unauthorised access, use modification or disclosure and destroy or de-activate the information if it is no longer needed;
- provide access for individuals to their Personal Information and allow to update, correct or amend their Personal Information where necessary;
- only use Personal Information for the purpose it was collected unless the person has given their consent or if exemptions apply;
- only disclose Personal Information with a person's consent or if exemptions apply.

5.1 UNSW Global functions

- (a) UNSW Global operates in educational and assessment areas which are ancillary to the core business (research and degrees) of UNSW. UNSW Global has two core functions:
 - i. Educational measurement and assessment, managed through the Business Unit: Assessment (UNSW Global Assessments); and



- ii. Education and training, managed through the Business Unit: Education (including UNSW Foundation Studies & UNSW Institute of Languages (UNSWIL)).
- (b) These Business Units are supported by and partnered with a number of functions including IT, finance, human resources, legal & compliance and sales & marketing.

5.2 Collecting Personal Information

In this Policy, Personal Information includes Sensitive Information and Health Information unless otherwise stated.

- (a) UNSW Global may collect the following information:
- Personal Information, such as: the individual's name, date of birth, contact details, including postal and residential address, email address, phone number and/or mobile number;
 - Sensitive Information, such as: racial or ethnic origin or criminal record.
 - Health Information, such as: information or opinion about the health or a disability of an individual, e.g. professional medical practitioner certificates.
- (b) UNSW Global may collect Personal Information, Sensitive Information and Health Information in a number of ways, including the following:
- Directly from individuals or their authorised representative, for example when the individuals: complete online or hardcopy forms; submit assessment materials, applications, instructions or invoices; speak with UNSW Global staff in person or by telephone; correspond with UNSW Global by letter or email; use UNSW Global websites or social media platforms; or participate in UNSW Global's marketing initiatives.
 - Indirectly from education agents and UNSW Global Assessment's overseas resellers (where relevant) where an individual gave a consent for the information to be collected and disclosed to UNSW Global.
 - Automatically through digital communication information from search engines or UNSW Global website hosts (including through the use of cookies and similar technology). This information includes the individual's Internet Protocol (IP) address and the web pages visited immediately before and after accessing UNSW website.
- (c) UNSW Global may collect Personal Information for primary and secondary purposes.

Primary purposes include:

- i. Delivery of education and assessment services including, but not limited to: recruitment, admission, teaching, academic administration, research, market research, and analysis of data which includes de-identified Personal



- Information of UNSW Global Students and School Students who undertake UNSW Global assessments.
- ii. Interactions with UNSW Sydney as UNSW Global's parent entity, for example, for the purpose of managing emergencies; facilitating access by UNSW Global Students to UNSW services and support, either in their capacity as UNSW Global students or when transitioning to UNSW Sydney to commence studies at UNSW Sydney; collaborating with UNSW Sydney for commercial purposes, including but not limited to conducting tests and research; reporting to UNSW Sydney as a controlled entity and as an entity that delivers educational services under UNSW Sydney's CRICOS code.
 - iii. Conducting its business operations including, but not limited to: dealing with requests, enquiries or complaints from UNSW Global Students, School Students and their parents or guardians; dealing with third parties, such as UNSW Global's customers, Business Partners and Service Providers; for Human Resources purposes; or for interacting with other organisations and companies.

Secondary purposes may include:

- i. Showcasing achievements of UNSW Global Students and School Students, for example, in student graduation books or year books, testimonials, in-house videos or Student Newsletters;
 - ii. Marketing, advertising and promoting UNSW Global products and services for example, in marketing materials, testimonials, via the UNSW Global website and through social media.
- (d) UNSW Global informs individuals that it collects their Personal Information, either at or before the time of collection, or as soon as practicable thereafter, either through a form used to collect the information or by giving a notice to individuals or by otherwise ensuring that the individuals are aware of the collection of their Personal Information. The notification will be in writing wherever possible.
- (e) Further examples of UNSW Global's functions and activities and the type of Personal Information collected are outlined in [Annexure 1](#).

5.3 Consent

Where necessary and as required by law, UNSW Global may seek specific consents from an individual to collect, use and disclose the individual's information.

5.3.1 The consent must be sought when:

UNSW Global collects Sensitive Information about an individual, unless the collection of the information is required or authorised by or under an Australian law or a court/tribunal order;

The use or disclosure of Personal Information is not directly related to the primary purpose of collection, unless:



- the individual would reasonably expect UNSW Global to use or disclose the information for the secondary purpose or the use; or
- the disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order;

UNSW Global collects and uses Personal Information, such as testimonials or photos of an individual in marketing or advertising materials. Note, consent is only required where the person's identity is clear or can reasonably be ascertained from an image or a video, and in case of testimonials, where the testimonial contains personally identifiable information. Please click the links below to access the consent forms:

- [Student Consent Form](#)
- [Parent/ Guardian Consent Form](#)

The use or disclosure of Personal Information is for the purpose of direct marketing, unless certain exceptions under the law apply;

UNSW Global discloses Personal Information about an individual to an Overseas Recipient, unless:

- the Overseas Recipient of the information is subject to a law that has the effect of protecting the information similar to the Australian Privacy Principles; and
- there are mechanisms that the individual can access to take action to enforce that protection of the law; or
- the disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- the disclosure of the information is required or authorised by or under an international agreement relating to information sharing to which Australia is a party; or
- UNSW Global reasonably believes that the disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body, and the Overseas Recipient is a body that performs functions, or exercises powers, that are similar to those performed or exercised by an enforcement body.

5.3.2 Consent is not required if there is a Permitted General situation, for example, UNSW Global reasonably believes that the collection, use or disclosure is necessary:

- to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety;
- where UNSW Global has reason to suspect that unlawful activity, or misconduct of a serious nature that relates to UNSW Global's functions or activities has been, is being or may be engaged in, the collection, use or



disclosure is necessary in order for UNSW Global to take appropriate action in relation to the matter; or

- UNSW Global reasonably believes that the collection, use or disclosure is reasonably necessary to assist any APP entity, body or person to locate a person who has been reported as missing.

5.4 Anonymity and Pseudonymity

- (a) For most of its functions and activities, UNSW Global needs Personal Information from identifiable individuals to perform its operations, e.g. to deliver educational services, to conduct educational assessments or testing, or to handle an inquiry or complaint etc.
- (b) Where practicable, an individual can choose not to identify themselves or to use a pseudonym. For example, if an individual calls UNSW Global to make a simple enquiry, they will not be asked about their name and contact details unless this information is needed to provide a response.

5.5 Storage, Security and Disposal

- (a) Where practicable, UNSW Global will seek to ensure that Personal Information is stored securely within Australia.
- (b) Where UNSW Global engages Service Providers to store Personal Information, UNSW Global will seek assurance in its contracts with the Service Providers that they will comply with applicable privacy and data protection law.
- (c) UNSW Global has processes in place to limit access to Personal Information and to prevent unauthorised access, by using measures, such as: user identification, the encryption of data or different level of user access.
- (d) UNSW Global Staff are permitted to email or otherwise transfer Personal Information held on UNSW Global's systems to outside systems (such as their personal email accounts or file hosting services) only if it is absolutely necessary, i.e. for a justified academic, research or business need, and if it is done in accordance with the UNSW Global IT Security Policy: *5.13 Bring Your Own Device (BYOD) Policy* and relevant procedures.
- (e) UNSW Global will securely destroy or de-identify Personal Information it holds once the Personal Information is no longer needed for any purpose for which the information was collected. This requirement does not apply where the Personal Information is contained in a Commonwealth or state record (for the purposes of records retention laws) or where UNSW Global is otherwise required by law to retain the information.

5.6 Direct Marketing

- (a) UNSW Global may use Personal Information collected directly from an individual for the purpose of direct marketing, provided that individual has opted in to receive such communications.



- (b) An individual can request not to receive direct marketing communications from UNSW Global by opting out of receiving future emails or SMSs.
- (c) UNSW Global provides information about how to opt out in each direct marketing communication.

5.7 Disclosing Personal Information

- (a) UNSW Global is a related body corporate and a controlled entity of UNSW Sydney. Section 13B of the *Privacy Act 1988* (Cth) permits UNSW Global to disclose Personal Information to UNSW Sydney as is necessary to carry out its activities and functions, including those set out in paragraphs 5.1 and 5.2 above and in [Annexure 1](#).
- (b) UNSW Global may disclose Personal Information to other third parties in the following cases:
 - i. to UNSW Global's agents, consultants, contractors and Service Providers who assist UNSW Global in running its business or provide related services, and who are subject to security and confidentiality obligations;
 - ii. to UNSW Global Business Partners, to the extent they are involved in the provision of UNSW Global services to customers;
 - iii. where an individual has consented the disclosure to a third party; or
 - iv. if the law allows or requires UNSW Global to do so.
- (c) UNSW Global will not disclose Sensitive Information without obtaining the consent of the individual unless the disclosure is necessary to prevent a serious and imminent threat to the life or health of the individual concerned or another person or in accordance with section 16A of the *Privacy Act* (Cth)
- (d) While UNSW Global's main teaching venues are in New South Wales, it operates in more than 20 countries worldwide, predominantly in the Asia-Pacific region. UNSW Global may disclose Personal Information, outside New South Wales, to Commonwealth government agencies or to Overseas Recipients where:
 - i. UNSW Global has taken reasonable steps to ensure the Overseas Recipient does not breach the Privacy Principles in relation to the information; or
 - ii. UNSW Global reasonably believes that the Overseas Recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles protect the information, and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme
 - iii. the individual has expressly consented for UNSW Global to do so; or



- iv. as set out in paragraph 5.3 (e) of this Policy.

5.8 Privacy Impact Assessment

When developing or reviewing a project, such as: new or amended programs, activities or databases, UNSW Global may consider the need for a Privacy Impact Assessment (PIA). A PIA identifies how a project can have an impact on individuals' privacy, and makes recommendations for managing, minimising or eliminating privacy impacts.

5.9 Data breach response plan and notification

In the case of a serious data breach (where there is a real risk of serious harm), UNSW Global will inform the OAIC and affected individuals in the manner required by the *Privacy Act 1988* (Cth).

5.10 Accessing and correcting Personal Information

If an individual believes that the Personal Information which UNSW Global holds about them is inaccurate, out-of-date, incomplete, irrelevant or misleading they have the right to request the information to be corrected.

To request amendment of his/her Personal Information, the individual should:

- (a) Provide his/her personal and contact details, and describe the Personal Information about him/her that they would like to amend, providing the reasons that he/she considers the information to be incomplete, incorrect, out-of-date, or misleading;
- (b) Send the request to the UNSW Global Privacy Officer:
 - by email at legalandcompliance@unswglobal.unsw.edu.au; or
 - by post to the following address:

*Attn: The Privacy Officer,
Legal and Compliance Team
UNSW Global Pty Limited
PO Box 6666 UNSW
Sydney NSW 1466
Or
12-22 Rothschild Avenue
ROSEBERY NSW 2018*

- (c) To prevent adverse consequences of unauthorised disclosure of Personal Information, UNSW Global will verify the individual's identity and authority to request the change prior to processing the request.
- (d) There is no fee to request correction of Personal Information.
- (e) UNSW Global will aim to respond to the request within 30 days.



5.11 Complaints about handling Personal Information

If an individual believes that UNSW Global has misused their Personal Information they can contact the UNSW Global Privacy Officer to discuss and try to resolve the issue informally, or lodge an application for a formal review with UNSW Global, or complain to the OAIC.

Please note that the OAIC generally requires individuals to complain directly to the agency or organisation (in this case, UNSW Global) and allow 30 days for it to respond before the individual can lodge a complaint with the OAIC.

To lodge an application for a formal review with UNSW Global, an individual should:

- (a) Complete a *Complaint Form* in line with the UNSW Global Complaints and Appeals Policy within twelve (12) months of the time an individual became aware of the misuse of their personal information. The form is available through the link below:
[Complaint Form](#)
- (b) The complaint can be made about:
 - Collection of Personal Information
 - Security or storage of Personal Information
 - Refusal to access or find out about Personal Information
 - Accuracy of Personal Information
 - Use of Personal Information
 - Disclosure of Personal Information
- (c) Email or post the form to [the UNSW Global Privacy Officer](#).
- (d) The individual will be informed in writing of the result of the review.
- (e) UNSW Global aims to respond to the complaint within 10 working days. If the complaint is complex and requires more extensive investigation, UNSW Global will use all reasonable endeavours to complete the review within 30 days.
- (f) If the individual is unhappy with the result of the review he/she can lodge a complaint with the OAIC. Information on how to lodge a complaint can be found on [the OAIC website](#)

6 Legal and Policy Framework

This Policy sets the foundation for UNSW Global compliance with the following legal and regulatory requirements:

- [Health Records and Information Privacy Act 2002 \(NSW\) \(HRIP Act\)](#)
- [Privacy Act 1988 \(Cth\)](#)
- [Privacy and Personal Information Protection Act 1998 \(NSW\) \(PPIP Act\)](#)

6.1 Responsibilities

- (a) *Approver*

The Chief Executive Officer is responsible for the approval of this policy.



(b) *Responsible Officer*

The Head of Legal and Compliance is responsible for the implementation, dissemination and review of this policy.

(c) *Contact Officer (if applicable)*

The Policy and Compliance Officer is responsible for the day to day implementation of this policy and is the first point of contact for all enquiries that relate to this policy.

(d) *Policy and Compliance Officer*

The Policy and Compliance Officer is responsible for the administration and publishing of this policy.

(e) *Staff, Supervisors and Executives*

UNSW Global staff, supervisors and executives are responsible for assisting in the implementation of and adherence to this policy.

6.2 Review

This policy is due for review 2 years from its date of implementation or in case of legislative or regulatory changes.

7 Related Documentation

- (a) [Privacy Impact Assessment Form](#)

8 Related Policies and Procedures

N/A

9 Version History

Version Control	Date Effective	Approved By	Amendment Notes
2.0	See approval table, pg. 1	See approval table, pg. 1	<ul style="list-style-type: none"> • Definitions of: <i>APP entity, Business Partner, Consent, CRICOS Code, Direct marketing, Express consent, Health Information, Information Protection Principles (IPPs), Implied consent, Overseas Recipients Permitted General Situation, School Student, Service Provider, and UNSW Global Student</i> added • New points added: UNSWG functions, primary and secondary purposes of collecting Personal Information, consent, anonymity and pseudonymity, Privacy Impact Assessment and data breach response • Further information added about: UNSWG functions and activities and type of Personal Information collected (Annexure 1), accessing and correcting Personal Information and making complaints • Complaints Form added



			<ul style="list-style-type: none">• Privacy Impact Assessment (PIA) form added
--	--	--	--



Annexure 1

UNSW Global Business Group	Functions and Activities	Type of Personal Information Collected
Education Business Group		
UNSW Foundation Studies	Delivering university pathway programs to UNSW Sydney and other universities	<i>Examples: UNSW Global Students</i> <ul style="list-style-type: none"> • name • physical address
UNSW Institute of Languages	Language teaching and testing	<ul style="list-style-type: none"> • mobile phone number • landline
Recruitment, Admissions, Academic Services and Student Life	International student recruitment, admissions, academic administration and student services <i>Examples of activities</i> <ul style="list-style-type: none"> • receiving and considering Student applications • where UNSW Global Students have applied through an Australian or overseas agent, sharing information about the UNSW Global Student with the agent • administering complaints and appeals processes • administering disciplinary processes • providing administrative services for a wide range of matters including UNSW Global Student enrolment, progress and welfare • responding to queries (whether online, over the phone or in person) • managing adjustments for UNSW Global Students with a disability • assisting when UNSW Global Students ask for help on personal issues (eg referrals to counsellors, liaising with doctors and other specialists and UNSW Sydney) • providing recreational activities, support services and social events for UNSW Global Students, such as excursions, graduation ceremonies, year books, 	<ul style="list-style-type: none"> • student and personal email addresses • date of birth • gender • citizenship • passport number • student visa • academic records and transcripts • enrolment details • student number • Unique Student Identifier (for domestic students in certain UNSWIL courses) • assessment results • records relating to complaints, appeals, grievance procedures or misconduct • photographs, videos or other recordings that identify the UNSW Global Student • if a parent or guardian, their relationship to the UNSW Global Student • health and other Sensitive Information where this affects a UNSW Global Student's progress or assessment, the management of emergencies or other aspects of a person's welfare • in the context of a complaint, Personal Information about the complainant and others who are involved, in order to deal with the complaint



UNSW Global Business Group	Functions and Activities	Type of Personal Information Collected
	<ul style="list-style-type: none"> • assisting UNSW Global Students who transition to UNSW Sydney after completing their studies with UNSW Global • dealing with third parties that provide goods or services to UNSW Global Students where we have been involved in procuring the good or service for the student (eg health insurance providers) • communicating with UNSW Global Students about matters related to their study • marketing UNSW Global’s services through all forms of media (including our website, social media pages, brochures and pamphlets) • conducting research and analysis (including market research) • managing emergencies • communicating with UNSW Global students about emergencies identified by UNSW Sydney 	<ul style="list-style-type: none"> • in the context of disciplinary or misconduct proceedings, Personal Information about the UNSW Global Student in question and others who are involved, in order to deal with the matter
UNSW Global Assessment Business Group		
UNSW Global Assessment	<p>Delivering educational assessment programs, examination and survey data services, developing and commercialising related products and services, and associated professional development services.</p> <p><i>Examples of activities</i></p> <ul style="list-style-type: none"> • conducting the International Competitions and Assessments for Schools (ICAS) for School Students at schools in Australia and overseas • conducting research and analysing School Student data to develop new products, services and resources 	<p><i>Examples of types of information about School Students (some of which may be Personal Information)</i></p> <ul style="list-style-type: none"> • name • date of birth • school name • year level • School Students’ test results • photographs, videos or other recordings that identify the School Student <p><i>Examples of types of information about the school representatives that we deal with (such as Principals and teachers), some of which may be Personal Information</i></p> <ul style="list-style-type: none"> • name



UNSW Global Business Group	Functions and Activities	Type of Personal Information Collected
	<ul style="list-style-type: none"> • sharing de-identified School Student results data with Business Partners 	<ul style="list-style-type: none"> • occupation • position • school name • physical address • mobile phone number • landline • email address
Other UNSW Global Business Groups		
<p><i>Other UNSW Global Business Groups perform business support functions such as Human Resources, Finance, IT, Marketing and Legal and Compliance. These Business Groups support UNSW Global's core activities.</i></p>	<p><i>Human Resources</i></p> <ul style="list-style-type: none"> • recruiting new Staff • maintaining Staff records • managing Staff performance management, complaints, misconduct and grievance procedures • managing adjustments for Staff with a disability • assisting where Staff ask for help with personal issues 	<p><i>Examples of types of Personal Information about Staff or applicants</i></p> <ul style="list-style-type: none"> • name • physical address • mobile phone number • landline • personal email addresses • work email address • date of birth • gender • employment history • qualifications, education and training • academic transcripts • employer references • criminal history (where relevant to position) • Working with Children Check (where relevant to position) • in the context of a complaint, Personal Information about the complainant and others who are involved, in order to deal with the complaint • in the context of disciplinary or misconduct proceedings, Personal Information about the Staff Member in question and others who are involved, in order to deal with the matter
	<p><i>Finance</i></p> <ul style="list-style-type: none"> • managing UNSW Global Student fees and payment matters • managing Staff payroll and benefits 	<p><i>Examples of types of Personal Information about Staff and UNSW Global Students</i></p> <ul style="list-style-type: none"> • information in relation to Staff salaries and benefits



UNSW Global Business Group	Functions and Activities	Type of Personal Information Collected
	<ul style="list-style-type: none"> managing Staff use of corporate credit cards 	<ul style="list-style-type: none"> Staff bank account information
	<p><i>IT</i></p> <ul style="list-style-type: none"> managing the access controls, security and integrity of data held in Global's information systems, including <ul style="list-style-type: none"> databases (e.g. UNSW Global Student information databases managed by Global's Admissions team and employee data managed by our HR team) content management systems (such as our contracts management system) outsourcing IT functions to third parties (such as cloud service providers) where such parties are subject to confidentiality and security obligations managing data back-up processes 	<p><i>Examples of types of Personal Information about Staff and UNSW Global Students</i></p> <p>IT has a role in supporting all Global's systems which contain Personal Information. Examples of Personal Information which IT handles in a more direct way include:</p> <ul style="list-style-type: none"> Staff and UNSW Global Student usernames and passwords Staff and UNSW Global Student email addresses IP addresses Staff and UNSW Global Student use and consumption of UNSW Global's IT products and services (e.g. websites, business software and digital devices).
	<p><i>Marketing</i></p> <ul style="list-style-type: none"> preparing, publishing or distributing advertising, promotional and other marketing material (e.g. on our website, social media pages, hard copy brochures, handbooks and pamphlets, video testimonials) running recruitment and promotional events (e.g. at careers fairs) running trade promotions communicating with UNSW Global Students or potential UNSW Global Students for marketing purposes (including by email or mobile phone where UNSW Global Students have opted in to receive such communications, but we will always provide a straightforward way of opting out) 	<p><i>Examples of types of Personal Information about UNSW Global Students, Staff and School Students</i></p> <ul style="list-style-type: none"> name physical address mobile phone number landline social media contact details UNSW Global Student and School Student and personal email addresses date of birth job title (if a Staff Member) student number (if a UNSW Global Student) photographs, videos or other recordings that identify the UNSW Global Student, Staff Member or School Student (though we will seek



UNSW Global Business Group	Functions and Activities	Type of Personal Information Collected
	<ul style="list-style-type: none"> collecting data, conducting research and performing analysis to improve existing, and develop new, products and services 	specific consent unless it is not reasonably practicable to do so)
	<p><i>Legal and compliance</i> Advising UNSW Global on the following:</p> <ul style="list-style-type: none"> its legal rights and obligations in relation to UNSW Global Students or School Students; parents or guardians of Under 18 UNSW Global Students or School Students; Staff; and third parties such as customers, Business Partners and others regulatory compliance matters Student complaints, misconduct or disciplinary matters Staff complaints, misconduct or disciplinary matters negotiating and managing contracts litigation and disputes to which it is a party briefing external solicitors, barristers and other advisers agreements and arrangements with UNSW 	All the types of Personal Information we hold, including the examples in this table.
All UNSW Global Business Groups		
<i>All Business Groups</i>	Engaging third party suppliers (e.g. cloud service providers, IT providers and consultants) to enable UNSW Global to improve its infrastructure, systems, processes, products and services	All the types of Personal Information we hold, including the examples in this table.
	<p>All interactions with UNSW as UNSW Global's parent entity, including:</p> <ul style="list-style-type: none"> administering packaged offers of admission to UNSW Global and UNSW managing emergencies (including calling or texting UNSW Global 	All the types of Personal Information we hold, including the examples in this table



UNSW Global Business Group	Functions and Activities	Type of Personal Information Collected
	<p>Students and UNSW Global staff on their mobile or other devices);</p> <ul style="list-style-type: none"> • facilitating access by UNSW Global Students to UNSW services such as UNSW Disability Services, counselling and health services • complaints, disciplinary and misconduct matters affecting UNSW Global or UNSW • working with UNSW Sydney to improve existing, and develop new, products and services to UNSW Global Students or UNSW students (which may involve collecting and sharing data with UNSW Sydney, and performing research and analysis) • maintaining and developing UNSW and UNSW Global's business infrastructure, services, systems and processes. 	
	<ul style="list-style-type: none"> • Exercising our rights, or fulfilling our obligations under, a contract with an individual. • Communicating with customers in order to improve our services. • Sending information and material that are related to UNSW Global services or that may be of interest to a customer. • Any other purpose for which Personal Information was provided to UNSW Global or for any purpose related or ancillary to any of the above. 	<p>All the types of Personal Information we hold, including the examples in this table.</p>

