



## VICTORIAN COMMERCIAL TEACHERS ASSOCIATION (VCTA) PRIVACY POLICY

Effective Date: 09/06/2018

### Introduction

Victorian Commercial Teachers Association ("VCTA" "us" or "we") manage personal information in accordance with the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles ("APP") contained therein. This Privacy Policy outlines the types of personal information VCTA may collect, how that personal information will be collected, used, disclosed, transferred and stored, and sets out the measures taken to comply with the Privacy Act.

This Policy sets out how the Victorian Commercial Teachers Association (VCTA) ABN 31 004 590 158 with an address 134-136 Cambridge Street, Collingwood VIC 3066 Australia and its members and affiliates, collects, stores, uses, protects and shares your personal information. It applies to all users of the VCTA websites, platform, applications, products and services.

### Consent

By providing VCTA with personal information, you consent to us collecting, using, storing and disclosing that information in accordance with this Privacy Policy.

### Definitions

In our Privacy Policy:

**Associated Third Parties** means individuals, companies and other entities with whom we work to provide products and services (for example, companies and consultants offering products related to our services or other service providers).

**Personal Information** has the meaning given to it in the Privacy Act

**Privacy Policy** means this document as amended from time to time

**Related Entities** has the same meaning as under the Corporations Act 2001

**Services** means the services we provide in our business

**Social Networking Sites** means any social networking sites operated or utilised by VCTA.

The meaning of any general language is not restricted by any accompanying example and the words 'includes', 'including', 'such as', 'for example' or similar words are not words of limitation.

### Collection

When you interact with VCTA through the services we provide, we may collect personal information from you that is necessary for us to undertake our business and perform our functions and activities. If we do not do so, or if the information is incomplete or inaccurate, we may not be able to undertake our business or the standard and quality of our service may be compromised.

Your personal information may be collected by VCTA if you voluntarily register for an event through an online event website or if you request a booking or a proposal, or your data is manually entered into our system/s by one of our staff members. This personal information may include your name, email address, phone numbers, addresses, bank and credit card details (including expiry dates) if required for payments and other personally identifiable information. If you voluntarily provide information in connection with registration for an

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event or project, or in the purchase of other products distributed by VCTA, it will be available to VCTA and held by us in accordance with this Privacy Policy.

Although not an exhaustive list, the personal information we collect may include:

- a. your name, Customer IDs and passwords, phone number, mobile telephone number, email address, physical address, place of employment and other contact information when you submit contact requests, information or create an account or user profile on the website;
- b. information you input, upload or enter as part of completing a conference or event registration, membership form or professional learning application may include information about your employment, other work-related information, mobility or dietary requirement, opinions and preferences;
- c. records and content of communications with VCTA;
- d. to the extent permitted by law, other personal information provided by or obtained from third parties;
- e. personal information may be collected by VCTA if you voluntarily register for an event through a third party account or complete a registration form or if you request a booking or a proposal for a service from VCTA, or your data is uploaded into the system by one of our staff. This personal information may include your name, email address, phone number, address, bank and credit card details (including expiry dates) if required for payments and other personally identifiable information and will be held by us in accordance with this Privacy Policy; and
- f. personal information from your interaction with the website including device identifiers, device type, geo-location information, connection information, statistics on page views, traffic to and from the website, mobile network information, time, date, referring URL, the type of operating system and browser, IP address, standard web log and analytics data.

While we do not store credit card information, we do store a token provided to us via our Payment Processing provider, SecurePay. We interact with their services in an encrypted, secure and standardised way. You can read more on their Privacy and Security policies here: <https://www.securepay.com.au/privacy-policy/> and <https://www.securepay.com.au/features/security/>

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

In addition to the sources described above, we may also collect personal information:

- from online directories;
- through our websites and any Social Networking Sites we utilise;
- through our Related Entities;
- from you subscribing to receive alerts, announcements, brochures or information from us or from filling in forms, questionnaires, applications or requests for information on website or as requested by us;
- when you contribute material or data to our website or to use in our business;
- when you use our services;
- from publicly available sources of information;
- from our records of how you engage with us and our business; or
- when we are required to do so by law.

**Dealing with Personal Information**

In addition to any other purposes set out in this Privacy Policy, we may use the personal information we collect:

- to undertake our business and provide you with services and information;
- to manage and keep up to date our websites and any Social Networking Sites we utilise;
- to disclose information to debt collection agencies to recover amounts owed to us;
- to undertake direct marketing;
- to ensure your health and safety;
- to contact you for the purpose of undertaking surveys and research;
- for the purpose indicated to you at the time we collected your personal information;
- to verify your identity or conduct appropriate checks in connection with your interaction with us and our business including when you register or login to our websites;
- to process your inquiries;
- to provide and administer our services in connection with our business or services of third parties;
- to comply with and monitor compliance with our contractual, regulatory and other legal obligations including applicable codes and guidelines;
- to monitor use, infrastructure quality and performance and operate, maintain, develop, test and upgrade our systems and infrastructure;
- to access system information or information about new or upgraded products;
- to disclose to your authorised representatives or advisers, or when you ask us to do so;
- to develop and improve our business and the services we provide;
- to protect and enforce our legal rights;
- to protect and defend our, or our employees', users' and clients' rights or property including against fraudulent or unlawful use of our websites and our intellectual property;
- to commercialise, exploit and protect our intellectual property;
- process payments;
- to recruit employees, contractors and consultants;
- to invite you to attend programs and events;
- to engage in research and development;
- to invite you to provide services to us;
- to provide you with information on offers, products and services offered by us or our Related Entities;
- to send you information about our activities, services or business;
- to notify you about changes to our business, services and websites; and
- to the extent permitted at law, for other purposes for which you have provided your express or implied consent.

Our functions, services and activities may change from time to time.

**Opting out**

If at any time you no longer wish to receive any additional marketing material from us, contact Michelle Mitchell, Executive Officer at [michelle.mitchell@vcta.asn.au](mailto:michelle.mitchell@vcta.asn.au) and we will remove your details from our marketing database.

**Disclosing Personal Information**

We may disclose your personal information to third parties in certain circumstances including:

- if you agree to the disclosure;
- where required for our operational purposes;
- for the primary purpose for which it was collected, e.g. to provide you with services or to facilitate the provision of those services to you;

- to our Associated Third Parties including service providers;
- where you would reasonably be expected to consent to information of that kind being passed to a third party (for example where you have requested information, products or services from them);
- where disclosure is required or permitted by law, by court order or to investigate suspected fraud or other unlawful activity;
- to conduct promotions or competitions in connection with our business;
- where it is required to be disclosed for audit purposes;
- if disclosure will prevent or lessen a serious or imminent threat to someone's life or health;
- if applicable, to fraud checking agencies;
- in connection with obtaining protection for intellectual property, commercialising or exploiting our intellectual property;
- to ensure your health and safety;
- to parties involved in corporate transactions in which we are involved or may be involved in the future;
- to comply with and monitor compliance with our contractual, regulatory, governmental and other legal obligations;
- to third parties to assist us in carrying out the above purposes; or
- otherwise as authorised by law.

### **Security**

VCTA will endeavour to protect the confidentiality of client information, account information and personal communications to the fullest extent possible and consistent with the law and the legitimate interests of VCTA, its members, its partners and its employees. To protect the loss, misuse, and alteration of information that is collected from clients, VCTA has physical, electronic, and managerial security procedures in place.

### **Considerations when you send information to us electronically**

While we do all we reasonably can to protect your personal information from misuse, loss, unauthorised access, modification or disclosure, including investing in security software, no data transfer over the internet is 100% secure. The open nature of the internet is such that information exchanged via the internet may be accessed and used by people other than those for whom the data is intended. If you send us any information, including (without limitation) personal information, it is sent at your own risk.

If you access another website from our websites, you do so and provide personal information in accordance with the terms and conditions under which the provider of that website operates.

### **Modification of client information**

You may request access to your personal information or correct any inaccurate or out of date information (including unsubscribing from any mail lists) by contacting Michelle Mitchell, Executive Officer at [michelle.mitchell@vcta.asn.au](mailto:michelle.mitchell@vcta.asn.au).

If there is a reason under the Privacy Act or other law for VCTA to not provide you with information, we will give you a written notice of refusal setting out the reasons for the refusal (except to the extent it would be unreasonable or unlawful to do so) and advise you of the mechanisms available to you to complain about the refusal.

### **Loss of personal information**

Despite our every effort to protect your personal information, there remains the possibility that a breach of our security could occur. In the event of loss of personal information VCTA will:

- Seek to rapidly identify and secure the breach to prevent any further breaches;
- Engage the appropriate authorities where criminal activity is suspected;

- Assess the nature and severity of the breach including the type of personal information involved and the risk of harm to affected individuals;
- Notify the affected individuals directly if appropriate and where possible;
- If appropriate, put a notice on our website advising our customers of the breach;
- Notify the Privacy Commissioner (at the OAIC) if the breach is significant.

**Retention and Deletion**

VCTA may retain your Client Information as long as you continue to use the services. It may also be necessary for us to retain your personal information to comply with applicable law, guidelines, codes or regulatory requirements. You may close your account by contacting VCTA in writing. Even if we delete your Information it may persist on backup or archival media and other information systems.

**Third party websites**

We are not responsible for privacy or security practices or the content of any third party websites accessed from our websites and we make no representations or warranties in respect of those websites. You must therefore read the third party's privacy policy and satisfy yourself as to the content and appropriateness of that policy.

**How we modify this Privacy Policy**

VCTA may from time to time update its privacy policy by posting an amended privacy policy that is always accessible by clicking on the "Privacy Policy" link on VCTA's homepage.

You should check the Privacy Policy through this link periodically (including on each occasion you provide us with personal information) for modifications by clicking on the link provided near the top of the Privacy Policy for a listing of material modifications and their effective dates.

If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on this site prior to the change becoming effective.

**Dealing with a complaint**

Any issues or complaints concerning this Privacy Policy and the terms contained therein should be directed to: Michelle Mitchell Executive Officer at [michelle.mitchell@vcta.asn.au](mailto:michelle.mitchell@vcta.asn.au).

**Privacy Commissioner**

More information about your rights and our obligations in respect to privacy and information on making a privacy complaint are available from the Office of the Australian Information Commissioner at:

Website:	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>
Post:	GPO Box 5218 Sydney NSW 2001
Email:	<a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>

**Further information on privacy**

You can obtain further general information about your privacy rights and Commonwealth privacy law from the Office of the Australian Information Commissioner by:

- calling their Privacy Hotline on 1300 363 992
- visiting their website at <http://www.oaic.gov.au> (External link)
- writing to:

The Australian Privacy Commissioner  
GPO Box 5218  
Sydney NSW 2001