

ECU Student GuildPRIVACY POLICY

POLICY TYPE	Operational & Senate
POLICY SUBTYPE	Administration
POLICY TITLE	Privacy Policy

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1. INTENT

1.1. This privacy policy describes how the Guild collects, uses, stores and discloses personal information in conducting our services across our campuses, and in our online engagement with students, staff and the general public.

2. ORGANISATIONAL SCOPE

2.1. This policy is binding to all Staff and Senate of the Edith Cowan University Student Guild, our departments and our related bodies' corporate.

3. **DEFINITIONS**

- 3.1. The singular includes the plural and vice-versa.
- 3.2. Words importing a gender include any other gender.
- 3.3. A reference to:
 - 3.3.1. A person includes a corporation and government or statutory body or authority;
 - 3.3.2. A person includes the legal personal representatives, successors, and permitted assigns of that person; and
 - 3.3.3. A statute, ordinance, code or other law includes regulations and other statutory instruments under it and consolidations, amendments, re-enactments or replacements of any of them by any legislative authority.
- 3.4. The word "including" and similar expressions are not words of limitation.
- 3.5. The word "under" includes by and by virtue of; as well as, pursuant to and in accordance with.
- 3.6. **CIDC** means the Continuous Improvement and Development Committee.
- 3.7. The Guild means Edith Cowan University Student Guild.
- 3.8. **Personal Information** means information that identifies or can reasonably be linked, directly, or indirectly, to an identifiable individual. Information that is anonymous, de-identified, or aggregated is not 'personal information' within the meaning of this Policy.
- 3.9. **Senate** means the duly elected student representatives of the Guild.
- 3.10. 'us' 'we' or 'our' means the ECU Student Guild ABN 87 081 487 187, our departments and our related bodies corporate

4. OVERVIEW

- 4.1. All Guild policies are approved, amended or repealed by the Senate in accordance with the Guild's Policy Framework and compliance with relevant governance instruments, following consultation with CIDC.
- 4.2. The Guild shall maintain a policy manual of all current policies in a manner which is easily accessible to members, Senate, staff and other stakeholders where appropriate.
- 4.3. All Guild policies will be reviewed annually.

5. POLICY

5.1. Collection of Personal Information

- 5.1.1. We may collect the following types of personal information:
 - 5.1.1.1. your name, student number, address, telephone and email contact details;
 - 5.1.1.2. your gender, date of birth or age and marital status;
 - 5.1.1.3. your billing details;
 - 5.1.1.4. information recorded in our system either by you or your Guild Student Assist Officer including the advice you have received, including date, service type, description of the advice, which officer consulted with you, current and past academic results, current and past medical history;
 - 5.1.1.5. your bank account or credit/debit card information;
 - 5.1.1.6. government related identifiers, including your Medicare number;
 - 5.1.1.7. your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, and data, IP address and standard web log information;
 - 5.1.1.8. 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;
 - 5.1.1.9. any additional information relating to you that you provide to us directly through our website 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;
 - 5.1.1.10. information you provide to us through emails and phone calls; or
 - 5.1.1.11. any other personal information that may be required in order to facilitate your dealings with us.

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- 5.1.2.We may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:
 - 5.1.2.1. register on our website;
 - 5.1.2.2. communicates with us in person, by phone, via mail, through correspondence, chats, email, online, or when you share information with us from other social applications, services or websites, or when we contact you through any means;
 - 5.1.2.3. interact with our sites, services, content and advertising or when you register, log in for and use services offered by us, including Guild Student Assist Services;
 - 5.1.2.4. when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.
 - 5.1.2.5. We may also collect your personal information from other persons or entities.
 - 5.1.2.6. Through your use of our services or website, we may also collect information from you about someone else. If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that information to us and that, without us taking any further steps required by applicable data protection or privacy laws, we may collect, use and disclose such information for the purposes described in this Privacy Policy. This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Privacy Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, our identity, and how to contact us. Where requested to do so by us, you must also assist us with any requests by the individual to access or update the personal information you have collected from them and entered into our website.
- 5.1.3.We may collect, hold, use and disclose your personal information for the following purposes:
 - 5.1.3.1. to enable you or our Guild Student Assist officers to access and use Cliniko, our website and our services;
 - 5.1.3.2 to operate, protect, improve and optimise our website and our services, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;

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- 5.1.3.3. to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- 5.1.3.4. to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- 5.1.3.5. 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;
- 5.1.4.We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.
- 5.1.5. We may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link).
- 5.1.6.In order to allow us to provide, manage and administer our products and services to you and to operate an efficient and sustainable business, we may be required to disclose your information to third parties. This may include disclosure in the following circumstances:
 - 5.1.6.1. our employees and related bodies corporate;
 - 5.1.6.2. hospitals, medical and ancillary service providers (for example, practitioners);
 - 5.1.6.3. any persons acting on your behalf including those persons nominated by you, executors, trustees and legal representatives;
 - 5.1.6.4. lawyers, auditors and other advisors appointed by us or acting on our behalf;
 - 5.1.6.5. where disclosure is required by law, including compulsory notices from courts of law, tribunals or government agencies;
 - 5.1.6.6. third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
 - 5.1.6.7. government and regulatory bodies, including, Medicare, the Australian Taxation Office, the Department of Veterans Affairs and the Department of Health and Ageing;
 - 5.1.6.8. professional advisers, dealers and agents;
 - 5.1.6.9. payment systems operators (eg merchants receiving card payments);
 - 5.1.6.10. our existing or potential agents, business partners or partners;

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- 5.1.6.11. our sponsors or promoters of any competition that we conduct via our services;
- 5.1.6.12. anyone to whom our assets or businesses (or any part of them) are transferred;
- 5.1.6.13. specific third parties authorised by you to receive information held by us; and/or
- 5.1.6.14. other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.
- 5.1.7. We can aggregate your non-personally identifiable data. By using our services, you agree that we can access and aggregate data we have collected from you using reasonable steps to use your personal information in a way it does not personally identify you. We may access, aggregate this data for our own use or for use by us:
 - 5.1.7.1. to audit, research, measure and analyse the information in order to maintain, administer, enhance and protect our products and services, including analysing usage trends and patterns and measuring the effectiveness of content, advertising, features or services;
 - 5.1.7.2. for contextual and cookie-based automated content delivery, such as tailored ads or search results;
 - 5.1.7.3. to prepare aggregate reports for Edith Cowan University and for our own financial reporting. Such reports may include age, gender, geographic, demographic or other general user information, but do not include personal information that personally identifies you.

5.1.8. Disclosure of Personal Information Outside Australia

5.1.8.1. If we send your information outside of Australia, we will require that the recipient of the information complies with local privacy laws and contractual obligations to maintain the security of the data.

5.2. Guild Student Assist Appointments and Interactions

- 5.2.1.All interactions with Guild Student Assist, including scheduling of or attendance at appointments, content of your appointment, progress or outcomes of your appointment, & your records are confidential. Your personal information & its treatment is important to us, & as such we protect that information by adhering to the strict privacy rules that are covered by national law under the provisions of the Privacy Act 1988 (Privacy Act). In line with the requirements of this law, require our GSA's to advise you why we need your information, for what purpose, & where or how it will be stored.
- 5.2.2. There are some situations where your information may need to be provided without your consent. Exceptions to confidentiality where a Duty of Care applies as follows:

5.2.2.1. Your health or safety is at risk;

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- 5.2.2.2. The health and safety of others is at risk;
- 5.2.2.3. There are serious criminal matters at risk;
- 5.2.2.4. There is a court directive

5.3. Using Our Website and Cookies

- 5.3.1.We may collect personal information about you when you use and access our website.
- 5.3.2. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.
- 5.3.3.We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.
- 5.3.4.We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

5.4. Transfer of Data to Third Party Applications

5.4.1.Our services may allow you, or others within the relevant subscription to our services to transfer Data, including your personal information, electronically to and from third-party applications and services. We have no control over, and take no responsibility for, the privacy practices or content of these applications or for their data storage processes. You are responsible for checking the privacy policy of any such applications so that you can be informed of how they will handle personal information.

5.5. Security

5.5.1.We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

5.6. **Links**

5.6.1.Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked

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websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

5.7. Accessing or Correcting Your Personal Information

- 5.7.1.As required under the Australian Privacy Principles, you can access the personal information we hold about you by contacting us at operations@ecuguild.org.au. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.
- 5.7.2.If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

5.8. Making a Complaint

5.8.1.If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us at operations@ecuguild.org.au. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

6. CONTACT INFORMATION

For queries relating to this document please contact:

Policy Owner	Operations Manager	
All Enquiries Contact	operations@ecuguild.org.au	
Telephone	08 6304 2640	
Email address	I.dwyer@ecuguild.org.au	

7. APPROVAL HISTORY

Policy Approved By	Senate
Date Policy First Approved	30/10/2020
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Revision History	
Revised by	
Next Revision Date	October 2021

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