

## Privacy Policy

### POLICY PURPOSE

UTS Insearch is committed to maintaining the privacy of all individuals who we deal with. This Policy sets out how UTS Insearch collects, secures, uses, handles and discloses your personal information.

Your interaction with UTS Insearch, use of any of our services and use of [insearch.edu.au](http://insearch.edu.au) or any other website through which you communicate with us (including through UTS Insearch social media profiles) indicates that you accept this Privacy Policy, and consent to our collection and use of your personal information (including sensitive information) according to the terms of this Policy.

### SCOPE

This Policy applies to UTS Insearch and any individuals that UTS Insearch collects personal information about.

**DEFINITIONS** are set out at the end of this Policy.

### POLICY PRINCIPLES

Principle
<p><b>OVERVIEW</b></p> <p>1. UTS Insearch collects, holds, uses and discloses personal information to perform its core functions and activities, including, for example:</p> <ul style="list-style-type: none"> <li>▪ student recruitment;</li> <li>▪ student applications and admissions;</li> <li>▪ teaching and administration of education programs;</li> <li>▪ student administration, accommodation, welfare and academic support;</li> <li>▪ management of students' progression to university;</li> <li>▪ human resources management; and</li> <li>▪ business analysis and management.</li> </ul> <p>As UTS Insearch is a controlled entity of UTS and a pathway provider to UTS, we may disclose any personal information (including sensitive information) collected in relation to future or current students to UTS.</p> <p>We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection, or required or authorised by law.</p>

## COLLECTION OF PERSONAL INFORMATION

2. The main way UTS Insearch collects personal information about you is when you give it directly to us, such as when you:

- contact us to ask for information;
- register at events;
- apply to study with UTS Insearch;
- enrol at UTS Insearch; and/or
- apply for a job with UTS Insearch.

### Collecting sensitive information

Sometimes we may need to collect sensitive information about you, e.g. to enable us to provide an appropriate teaching and learning or work environment to meet the diverse abilities, needs and circumstances of our students, Staff and Affiliates.

### Collecting personal information for security purposes

We collect personal information through clearly visible CCTV cameras when you visit an UTS Insearch campus and from UTS Insearch's contracted security guards. We also collect personal information by monitoring and recording the information input or output, or other use, of UTS Insearch's computer network and devices.

### Indirect collection

We may collect personal information (including sensitive information) about you indirectly from third parties such as:

- direct marketing database providers;
- enquiry management providers;
- health professionals who assist us to provide accessible teaching and learning or work environments;
- UTS Insearch's offshore liaison offices, offshore representative offices and educational providers who assist us in running our offshore education programs;
- international education agents;
- organisations that assist us to verify or supplement information collected in student application forms, including Year 12 results and ATAR rankings from the Universities Admissions Centre Pty Ltd;
- student accommodation and welfare providers;
- sponsoring organisations, including UTS in relation to student scholarship applicants; and
- organisations, government departments and/or individuals that assist us to assess, verify or supplement information provided in job applications, e.g. by providing references or conducting psychometric assessments.

Where UTS Insearch collects information about you from a third party, we will take reasonable steps to make you aware of the fact and circumstances of the collection.

### Anonymity

Where possible on request, UTS Insearch will allow you to interact with us anonymously or using a pseudonym, e.g. if you phone our Enquiries helpline with a general question, we may be able to handle your question without taking your name.

However, for most of our functions and activities we need your name and contact information and enough information about the particular matter to enable us to handle your enquiry, application, request or complaint.

### Collecting through our websites and through social media services

UTS Insearch has its own website: [insearch.edu.au](http://insearch.edu.au). Please refer to the [Website privacy notice](#) for details of the information that is collected through our website (including on electronic forms) and through social media services. When you communicate with us through a social media service, the social media provider and its partners may collect and hold your personal information overseas.

## DISCLOSURE OF PERSONAL INFORMATION

3. UTS Insearch recruits international students, Staff and Affiliates, and operates in overseas jurisdictions, including the People's Republic of China, India, Indonesia, Myanmar, South Korea, Sri Lanka and Vietnam. Common situations in which we disclose information (including sensitive information) overseas and to third parties are listed below:

- to UTS;
- to other education providers involved with UTS Insearch, to perform our core functions and activities where UTS Insearch operates in overseas jurisdictions;
- to government, regulatory and professional bodies, to fulfil UTS Insearch's legal and regulatory obligations;
- to your migration agent, if you are applying for a visa;
- to financial institutions for payment processing;
- to universities and the Universities Admissions Centre Pty Limited;
- to a student's sponsoring organisation in connection with the student's application, whereabouts, current enrolment status, academic record and whether they progress to UTS;
- to a student's education agent in connection with the student's application, whereabouts, current enrolment status, confirmation of term/semester completion and whether they progress to UTS; and
- to a student's emergency contact in connection with their whereabouts or safety.

Other than as set out above, once a student has enrolled, UTS Insearch does not disclose their personal information to education agents, sponsoring organisation or to their parents without the student's consent.

UTS Insearch also uses a number of service providers to whom we disclose personal information.

## STORAGE AND SECURITY OF PERSONAL INFORMATION

4. UTS Insearch takes steps to protect the security of the personal information we hold from both internal and external threats by:

- regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information;
- taking measures to address those risks, e.g. using information security technologies and maintaining secure access to our offices; and
- implementing workplace policies to support information security, e.g. the ICT Security Policy, Information Classification Policy and the Records Retention and Destruction Policy.

## ACCESSING AND CORRECTING PERSONAL INFORMATION

5. You have the right to ask for access to personal information that UTS Insearch holds about you, and to ask that we correct or update that personal information. Staff and Affiliates can ask for access or correction by emailing [hr@insearch.edu.au](mailto:hr@insearch.edu.au). Prospective, current or past students, or other individuals can write to or email the Privacy Officer, using the contact details in section 8 below.

UTS Insearch will ask you to verify your identity before we give you access to your personal information or correct it, and we will try to make the process as simple as possible. UTS Insearch will respond to access or correction requests within 30 days. We may charge a fee to cover our reasonable costs of locating and providing your personal information.

If you ask, we will ordinarily give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that requires us not to. If we refuse to give you access to, or correct, your personal information, we will notify you in writing setting out the reasons.

If we make a correction and we have disclosed the incorrect personal information to others, you can ask us to tell them about the correction. We will do so unless there is a valid reason not to.

## HOW TO MAKE A COMPLAINT

6. If you wish to complain to us about how UTS Insearch has handled your personal information, please email or write to the Privacy Officer, using the contact details in section 8 below. Please provide details of the date, time and circumstances of the complaint, and a proposal on how best to resolve the complaint.

The Privacy Officer will normally acknowledge receipt of your complaint within five business days, then complete an investigation and respond to your complaint within 30 days. UTS Insearch will determine what (if any action) we should take to resolve the complaint. If the matter is complex and the investigation will take longer, the Privacy Officer will write to let you know, with an estimate of when UTS Insearch expects to be able to respond.

If you are not satisfied with UTS Insearch's response you may refer your complaint to the [Office of the Australian Information Commissioner](#) (Telephone: 1800 472 679) or the [Office of the NSW Information and Privacy Commission](#) (Telephone: 1300 363 992).

**HOW TO CONTACT UTS INSEARCH**

7. UTS Insearch's contact details for privacy queries are:

Email: [privacy@insearch.edu.au](mailto:privacy@insearch.edu.au)

Telephone: +61 2 9218 8600

Post: Privacy Officer, Insearch Limited, PO Box K1085, Haymarket NSW 1240, Australia.

**CHANGES TO THIS POLICY**

8. UTS Insearch may amend this Policy from time to time. The current version will be posted on [insearch.edu.au](http://insearch.edu.au) and a copy may be obtained free of charge from the UTS Insearch Privacy Officer.

**DEFINITIONS**

Affiliates	Insearch Limited Board members, honorary appointees, contractors, labour hire personnel, volunteers, agency staff and any other person appointed or engaged by UTS Insearch to perform work or functions for UTS Insearch.
personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none"> <li>▪ whether the information or opinion is true or not; and</li> <li>▪ whether the information or opinion is recorded in any format or not.</li> </ul>
sensitive information	Sensitive information includes, for example: <ul style="list-style-type: none"> <li>a) information or an opinion about an individual's: <ul style="list-style-type: none"> <li>i. racial or ethnic origin; or</li> <li>ii. political opinions; or</li> <li>iii. membership of a political association; or</li> <li>iv. religious beliefs or affiliations; or</li> <li>v. philosophical beliefs; or</li> <li>vi. membership of a professional or trade association; or</li> <li>vii. membership of a trade union; or</li> <li>viii. sexual orientation or practices; or</li> <li>ix. criminal record; or</li> <li>x. bank or credit card information;</li> </ul> </li> </ul> that is also personal information; or <ul style="list-style-type: none"> <li>b) health information about an individual.</li> </ul>

SLT	The Senior Leadership Team of UTS Insearch.
sponsoring organisations	a student's sponsor or an organisation which manages a sponsorship on behalf of a sponsor
Staff	People employed to work on an ongoing, fixed term, sessional or casual basis under the terms and conditions of an employment agreement (contract) issued by UTS Insearch.
UTS	University of Technology Sydney
UTS Insearch	Insearch Limited and its subsidiaries.

## SUPPORTING DOCUMENTS

- Data Breach Response Plan
- Data Classification Procedure
- Health Records and Information Privacy Act 2002 (NSW)
- ICT Security Policy
- Information Classification Policy
- Information Classification Procedure
- Information Technology Act, 2000 (India) and relevant rules thereunder, including the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (India)
- [www.insearch.edu.au/privacy](http://www.insearch.edu.au/privacy)
- Privacy and Personal Information Protection Act 1998 (NSW)
- Privacy Act 1988 (Cth)
- Privacy Management Plan
- Privacy Impact Assessment
- Records Retention and Destruction Policy
- Records Retention and Destruction Procedure

## ADMIN USE ONLY

APPROVAL	
Signature:	
Position title:	<b>Managing Director</b> <span style="float: right;"><b>Date: 05/08/2019</b></span>
Policy Title	Privacy Policy
Senior Leader	CFO/Company Secretary
Manager	Governance Manager and Privacy Officer
Policy ID	PO/GOV/04/19
Effective Date	05/08/2019
<b>Approved by</b>	<b>SLT</b> <span style="float: right;"><b>Date: 30/07/2019</b></span>