# Ridley College Privacy Policy

Ridley College ("**Ridley**") is committed to protecting the privacy of individuals. We support and endorse the Australian Privacy Principles ("**APPs**") contained in the *Privacy Act* 1988 (Cth) ("**the Privacy Act**") and will only collect, use, disclose, and store personal information in accordance with these principles.

Ridley is required under the Privacy Act to have a clearly expressed and up-to-date privacy policy setting out how we manage personal information. The purpose of this policy is to explain how Ridley manages personal information and how Ridley will comply with its obligations under the Privacy Act. Changes may be made to this policy from time to time. We will give notice about these changes on the website.

#### **Definitions**

**Personal information** 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.

## **Sensitive information** means:

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

#### **Collection of personal information**

Whilst Ridley may collect personal information from a third party on some occasions, Ridley will generally collect personal information directly from the owner of the personal information. Personal information may be collected from visitors, when a person subscribes to a mailing or contact lists, when a person provides feedback or requests information, people that fill in and submit a Ridley form, prospective, current and former students, staff members, contractors, donors, and people attending Ridley events.

Ridley will generally obtain consent from the owner of personal information to collect their personal information. Consent will usually be provided in writing however sometimes it may be provided orally or may be implied through a person's conduct.

The type of information that Ridley collects will depend on the nature of a person's involvement with us.

The personal information collected by Ridley may include (but is not limited to) name, mailing address, email address, telephone number, date of birth, photo identification, emergency contact details (i.e. a next of kin), prior education details, credit card details, Tax File Number, Working With Children Check, and police check.

Ridley may also collect sensitive information from a person. For instance Ridley may request a person to provide details of any criminal record, health information, whether a person is of Aboriginal or Torres Strait Islander origin, a statement of their religious belief and details of the church they are affiliated with.

A person is not required to provide the personal information and/or sensitive information requested by Ridley, however if a person chooses not to provide information as requested, this may influence Ridley's ability to accept the person's application or service the person's needs. Similarly, a person can request to deal with Ridley using a pseudonym or anonymously. In circumstances where a person wishes to remain anonymous or use a pseudonym, Ridley will be able to respond to general requests for information.

Whilst it will not be practicable for Ridley to provide education to a person if they wish to remain anonymous, in some circumstances Ridley may be able to provide education to a person using a pseudonym.

Personal information is collected in hard copy, electronically, and verbally. For example through avenues such as forms, face-to-face meetings, email correspondence, and hard copy mail.

Ridley will endeavour to only ask a person for personal information that is reasonably necessary for the activities that the person is seeking to be involved in.

## **Using personal information**

Ridley may collect, hold, use or disclose a person's personal information for the following general purposes:

- (a) to identify a person;
- (b) for the purpose for which the personal information was originally collected;
- (c) for a purpose for which a person has consented;
- (d) for any other purpose authorised or required by an Australian law; and
- (e) for any other purpose authorised or required by a court or tribunal.

More specifically, Ridley may collect, hold, use or disclose a person's personal information for the following purposes.

#### Students

In relation to the personal information of students, Ridley's primary purpose of collecting the personal information is to enable Ridley to provide education to the student.

The purpose for which Ridley uses personal information of students include (but is not limited to):

- (a) correspondence to keep students informed about matters related to their education:
- (b) publication of newsletters and articles on Ridley's website;
- (c) day to day administration;
- (d) looking after a student's educational, social and medical wellbeing;

- (e) the collection of debts owed to Ridley; and
- (f) seeking donations and other fundraising activities for Ridley.

## Staff members and contractors

In relation to the personal information of prospective and current staff members, and contractors Ridley uses the personal information for the purposes including:

- (a) to enable Ridley to carry out its recruitment functions;
- (b) correspond with the person, provide training and professional development;
- (c) fulfil the terms of any contractual relationship; and
- (d) ensure that the person can perform their duties to facilitate the education of the students.

Ridley may publish the photos of staff and contractors in publications.

## **Disclosing personal information**

Ridley may disclose a person's personal information, including sensitive information, to:

- (a) Australian College of Theology;
- (b) government departments (including but not limited to the Department of Education, Department of Immigration and Citizenship, Centrelink and the Australian Taxation Office);
- (c) a diocese (for Anglican ordination candidates); and
- (d) any person Ridley is authorised to disclose personal information to.

Personal information may be disclosed to a recipient overseas (for example where we have outsourced a business activity to an overseas provider) in accordance with the Privacy Act, where we take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information.

# **Direct marketing**

Marketing and business development is important to ensure that Ridley continues to provide quality educational services. Ridley may use a person's personal information to send news updates and marketing information.

If a person does not want to receive any such information, the person can contact Ridley by email to the Privacy Officer at privacy@ridley.edu.au.

#### **Storing personal information**

Ridley takes all reasonable steps to protect personal information under its control from misuse, interference and loss and from unauthorised access, modification or disclosure.

#### Ridley website

The Ridley website uses cookies, tracking pixels and related technologies. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes. Also, cookies may be used to track how visitors use our site in order to target ads to visitors when they use other websites.

Ridley is not responsible for the content contained in links to other websites and the privacy practices of other websites, and encourages people to examine each site's privacy policy and make their own decisions regarding the accuracy, reliability and correctness of material and information found.

# **Updating personal information**

Ridley is committed to holding accurate and up-to-date personal information. A person may contact Ridley at any time to update their personal information.

Any information no longer required, will be destroyed or de-identified unless Ridley is required by law or under an Australian law or a court order to retain it.

## **Accessing personal information**

If an individual wishes to access personal information held about themselves in order to seek correction of such information they may do so by contacting the Privacy Officer at <a href="mailto:privacy@ridley.edu.au">privacy@ridley.edu.au</a>. In accordance with the Privacy Act, Ridley may refuse access to personal information in certain s circumstances. Ridley will seek to handle all requests for access to personal information as quickly as possible.

# **Complaints**

Complaints about a breach of the APPs must be made in writing to the Privacy Officer at <a href="mailto:privacy@ridley.edu.au">privacy@ridley.edu.au</a>. Ridley will investigate any complaint and will notify the complainant, in writing, of any decision as soon as practicable.

If a complainant is not satisfied with the response they can refer the complaint to the Office of the Australian Information Commissioner - enquiries@oaic.gov.au.

Approved 27/02/2017