

Purpose:

This policy explains how HVTC handles personal information and complies with the requirements of the Australian *Privacy Act 1988* (Privacy Act) and the National Privacy Principles.

Scope:

All HVTC employees and stakeholders are required to adhere to this policy when the work they perform falls within the policy's scope.

Responsibilities:

The Chief Executive Officer is responsible for the implementation of this policy. All employees, staff, students, contractors and visitors are responsible for co-operating with this policy.

Document Owner:

Commercial Manager

Policy:

Collection of personal information

HVTC collects personal information from clients, customers, employees, contractors and other individuals. This information is collected when it is necessary for our activities. It may only be collected by fair and lawful means and not in an unreasonably intrusive way. Personal information must be collected directly from an individual where it is reasonable and practical to do so.

The personal information we collect may be provided in forms filled out by individuals, face to face meetings, email messages, telephone conversations or by third parties. When HVTC is contacted by an individual, a record of that contact may be kept.

HVTC will only collect sensitive personal information, such as the individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, and criminal record with the individual's consent unless:

- Collection of such information is required by law, or
- Information is needed to prevent or lessen a serious and imminent threat to life or health of any person.

Personal information does not include employee records or information relating to a current or former employment relationship between HVTC and an individual.

Use of personal information

The main purposes in collecting personal information about individuals are:

- to provide our services
- to respond to an individual's request
- to maintain contact with clients, staff, employees and students
- to keep contacts informed of the services we offer and industry developments that may be of interest to them, and to notify them of service offerings and other events we are holding
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of our personnel and providing internal services to our staff and,
- all other purposes related to our business.

If we collect or use personal information in ways other than as stated in this policy, we will ensure we do so pursuant to the requirements of the Privacy Act.

Employee records are not generally subject to the Privacy Act and therefore this policy may not apply to the handling of information about employees by HVTC. For information about our practices relating to employee information, please contact us directly.

Personal information for a student may be requested to be submitted to National Centre for Vocational & Educational Research (NCVER) on a form that will not permit the individual student to be identified and confidentiality will be preserved.

HVTC will not disclose personal information to overseas recipients.

Disclosure of personal information

HVTC will only disclose personal information for the purpose for which it was originally collected. However the information may be used for other purposes only if we have the individual's consent or if the individual would reasonably expect that their information may be used in this way.

Disclosure to Service Providers

HVTC uses a number of service providers to whom personal information is disclosed. These include providers that manage HVTC's IT, payroll and student management systems. To protect the personal information HVTC discloses, a contract is entered into which requires the service provider to only use or disclose information for the purposes of the contract.

Privacy on Our Web Sites

This policy also applies to any personal information we collect via our website. In addition to personal information provided to us directly (such as where an individual makes a request or completes a registration/application form), HVTC may also collect personal information from individuals via its website.

Cookies may be used on some areas of our website. A cookie is a small software application which allows a website to recognise a previous user and to observe how a user navigates within a website. Cookies are now used as a standard by many websites. HVTC uses cookies to improve the navigational experience of visitors to our websites and to make them easier to use.

Most browsers now recognise when a cookie is offered and permit the user to opt out of receiving it. If an individual is concerned about cookies and is not sure whether the browser being used has this capability, it is recommended that this is checked with the software manufacturer or internet service provider being used. In most cases, a cookie can be refused and the HVTC website can still be fully navigated.

In order to properly manage our websites, HVTC may log certain statistics about the users of the sites, for example the users' domains and browser types. None of this information specifically identifies an individual and it is used solely to ensure that our websites present the best possible navigational experience for visitors.

Whenever a registered user logs in to our websites, they will be identified by their user name and password. The information HVTC collects about members' use of our websites is used purely for measuring site performance and in assisting to resolve any technical difficulties.

Because HVTC wants our website experience to be as informative and resourceful as possible, a number of links to websites operated by third parties is provided. HVTC is not responsible for the privacy practices or policies of those sites. HVTC encourages review of each website's privacy policy, especially any personal information is disclosed via that site. A link to another non-HVTC website is not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that site or advertised on that site.

The HVTC website interfaces with social media sites such as Facebook, LinkedIn, Instagram, YouTube and others. If an individual chooses to "like" or "share" information from our website through these services, the privacy policy of that service should be reviewed.

Security of Personal Information

Depending on the purpose for which HVTC has collected personal information, some of the information may be stored electronically. Some or all of this personal information may be available to authorised staff of HVTC for use in accordance with this policy.

HVTC will endeavour to take all reasonable steps to keep secure any information which we hold whether electronically or in hard-copy, and to keep this information accurate and up to date. HVTC also requires our employees to respect the confidentiality of any personal information held by HVTC.

HVTC aims to achieve industry best practice in the security of personal information which it holds. It is our policy to destroy personal information once there is no longer a legal or business need for us to retain it.

Notifiable Data Breach

HVTC takes many pre-emptive steps to prevent a data breach through the use of but not limited to a secure firewall, antivirus and antispam, restricting administrative and access privileges, backups and disaster recovery plan. Where an eligible data breach is suspected or believed to have occurred, HVTC will carry out a risk assessment, notify OAIC and contact all affected individuals directly or indirectly.

Access to Information

HVTC will provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted to withhold this information (for instance, where granting access would infringe another person's privacy).

When a request is made to access personal information, HVTC requires provision of identification (such as a driver's licence or passport) to verify the identity of the person to whom the information relates.

Corrections and Concerns

In the event of any concerns that the information HVTC holds is incorrect or out of date, or as to how personal information is being handled, HVTC should be contacted and every attempt will be made to resolve those concerns.

Should an individual wish to have their personal information deleted, HVTC should be advised and reasonable steps will be taken to delete it (unless it must be kept for legal, auditing or internal risk management reasons).

If HVTC becomes aware of any ongoing concerns or problems concerning privacy practices, these issues will be taken seriously and HVTC will work to address these concerns. Any further queries relating to HVTC's privacy policy, problems or complaints, should be directed to HVTC's HR department.

For more information about the way HVTC manages personal information, to access personal information or lodge a complaint please contact:

The HR Department
HVTC
PO Box 559
Maitland NSW 2320
admin@hvtc.com.au



Signed: Sharon Smith
Chief Executive Officer

Approved by the BOD on 19th April 2018

Due consideration has been given to legislation that may have been pertinent in the development of this policy. The relevant components have been incorporated and are again considered when conducting the policy review process.