

# PRIVACY POLICY

*Faith Diligence Love*

**SUNCOAST**  
CHRISTIAN COLLEGE



## Document Information

Approved by: College Board October 2021

Updated by: Principal September 2021

Review Date: September 2022

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## Policy

This Privacy Policy sets out how the Suncoast Christian College, ('the College'), manages personal information provided to or collected by it. The College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing school environment.

## Purpose

Suncoast Christian College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the Privacy Policy of the College and describes how the College uses and manages personal information provided to or collected by it.

## Scope

This policy applies to board members, employers, employees, volunteers, parents/guardians, students, contractors and visitors to the College, as well as visitors to the College website and associated social media web pages. It describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed and how the information may be accessed.

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

## Code of practice

All staff, who have access to personal information, need to read and abide by this policy. The policy is one of a list of College Policies that are presented to staff on employment and annually.

Such training for teaching staff is monitored by the Principal and for general staff monitored by the Business Manager.

## Reference

Australian Privacy Principles

*Privacy Act 1988 (Cth)*

*Privacy Amendment (Enhancing Privacy Protection) Act 2012*

Child Protection Policy

Disabilities Policy

## Review and version control

The College Board is considered the owner of this policy.

An annual review of this policy is recommended. The College, from time to time, may review and update this policy, subject to new laws and technology, changes to College operations and practices and to make sure it remains appropriate to the changing environment.

## Collection of personal information

The information collected and held by the College includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parent/guardian before, during and after the students' enrolment at the College:
  - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
  - parents' education, occupation and language background;
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
  - conduct and complaint records, or other behaviour notes, and school reports information about referrals to government welfare agencies;
  - counselling reports;
  - health fund details and Medicare number;
  - any court orders;
  - volunteering information; and
  - photos and videos at school events.
- job applicants, staff members, volunteers, visitors and contractors:
  - name, contact details (including next of kin), date of birth, and religion;
  - information on job application;
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (e.g. details of disability and/or allergies, and medical certificates);
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at school events;
  - workplace surveillance information; and
  - work emails and private emails (when using work email address) and Internet browsing history.
- other people who come in contact with the College including name and contact details and any other information necessary for the particular contract with the College.

## Personal Information you provide

The College will generally collect personal information held about an individual by way of forms filled out by parent/guardian or students, face-to-face meetings, interviews and telephone calls. On occasions, persons other than parent/guardian or students may provide personal information.

## **Personal Information provided by other people**

The College may receive personal information about an individual from a third party, such as a report provided by a medical professional or a reference from another school.

## **How will the School use the personal information you provide?**

The College will use personal information it collects for the primary purpose of collection and for such secondary purposes that are related to the primary purpose of collection and as reasonably expected, or to which the person concerned has consented.

## **Use of personal information**

### **Students and parent/guardian**

In relation to personal information of the student/s and parent/guardian, the primary purpose is to enable the College to provide schooling for the student/s enrolled at the College, exercise duty of care and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College. This includes satisfying the needs of parent/guardian, the needs of the student/s and the needs of the College, throughout the period of the students' enrolment at the College.

The purpose of use of personal information of student/s and parent/guardian may include:

- to keep parent/guardian informed about matters related to the student's education, through correspondence, newsletters and magazines;
- day-to day administration of the College;
- looking after student/s educational, social and medical well-being;
- to satisfy Government reporting requirements;
- seeking donations and marketing of the College; and
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

In some cases where the College requests personal information about a student or parent/guardian, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet [and on our website] this may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions [annually] from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos (or other identifying material) in our promotional material or otherwise make this material available to the public such as on the internet.

### **Job applications, staff members and contractors**

In relation to personal information of job applicants, staff members and contractors, the primary purpose is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The College uses personal information of job applicants, staff members and contractors:

- to administer the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds, donations and marketing for the College; and

- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

## Volunteers

The College obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

## Marketing and fundraising

The College treats marketing and the seeking of donations for the future growth and development of the College as an important part of ensuring that the College continues to be a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising (for example, the College's foundation or alumni organisation, or, on occasion, external fundraising organisations).

Parent/guardian, staff, contractors and other members of the wider College community may, from time to time, receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

If you would like to opt-out of direct marketing please contact the College on 07 5451 3600.

## Outside agents

The College may, from time to time, engage outside agencies to assist in the day to day running of the College and to provide a better service to the parent/guardian, (ie Flexischools, School Seconds etc). The College will not share personal details with these agencies and recommend that the privacy policy of these agents be reviewed prior to supplying personal details.

## Who might the School disclose Personal Information to and store your information with?

The College may disclose personal information, including sensitive and health information, about an individual for educational, administrative and support purposes. This may include to:

- another school or staff at another school;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the College including specialists visiting teachers, sport coaches, volunteers, counsellors and providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- people providing administrative and financial services to the College;
- recipients of College publications such as newsletters and magazines;
- students' parent/guardian;
- visitors to the College website;
- anyone to whom a person authorises the College to disclose information; and



- anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.

## Sending and storing information overseas

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

An example of such a cloud service provider is Microsoft 365. Microsoft 365 provides a variety of apps for education including Outlook for email, and stores and processes limited personal information for this purpose. School personnel and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Microsoft 365 and ensuring its proper use.

The data centres where the personal information is likely to be kept are located in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.

## Sensitive information

In referring to 'sensitive information', the College means, information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information health information and biometric information about that individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless agreed otherwise, or the use or disclosure of the sensitive information is allowed by law.

## Management and security of personal information

The College staff are required to respect the confidentiality of student/s and parent/guardian personal information it collects and the privacy of individuals.

The College has in place, steps to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

## Data breaches

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (**the affected individuals**);
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result;
- the information is lost in circumstances where:
  - unauthorised access to, or unauthorised disclosure of, the information is likely to occur;

- assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

## **What must the College do in the event of an ‘Eligible Data Breach’?**

If the College suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then the College will be required to lodge a statement to the Privacy Commissioner (Commissioner). Where practical to do so, the College entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, the College will publish a copy of the statement on its website, or publicise it in another manner.

## **Exception to notification obligation**

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information;
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

## **Updating personal information**

The College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update personal information held by contacting the College at any time.

The College will request that parent/guardian and volunteers update details annually.

## **Access and correction of personal information**

Under the Privacy Act, an individual has the right to seek and obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

To make a request to access or to update any personal information the College holds about you or your child, please contact the Principal in writing. the College may require you to verify your identity and specify what information you require. The College may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

The College will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

## Consent and Rights of Access to the Personal Information of Students

The College respects every parent's right to make decisions concerning their child's education. Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The College will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the Principal. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to a student.

The College may, at its discretion, on the request of a student grant that student access to information held by the College about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

## Enquiries and complaints

If further information about the way the College manages personal information held is required, or a complaint about a belief that the College has breached the Australian Privacy Principles contact the College Principal ([principal@suncoastcc.qld.edu.au](mailto:principal@suncoastcc.qld.edu.au)).

The College will investigate any complaint made and notify decision in relation to the complaint as soon as is practicable after the complaint has been received.

## Collection notices

A variety of collection notices will be used to ensure an individual is reasonably aware of privacy requirements in the Australian Privacy Principles and also to obtain consent for use/s and disclosure/s of personal information that may not be regarded as being for primary or secondary purposes to the collection.

The Standard Collection Notice (**APPENDIX 1**) will be:

- reproduced in enrolment packages;
- contained in this Policy;
- located on the College's website; and
- printed in the Parent Handbook, given to all new and existing parent/guardian and updated annually.

The **Alumni Association Collection Notice (APPENDIX 2)** will be sent to all past students, where possible.

The **Employment Collection Notice (APPENDIX 3)** will be sent to all job applicants with an acknowledgement of receipt of an application for employment at the College.

The **Contractor/Volunteer Collection Notice (APPENDIX 4)** will be sent to all contractors (including instrumental music teachers) and volunteers. NB: *For volunteers the form is printed on the back of the Application for Volunteering and the Confirmation of Volunteering forms.*

The College Websites Collection Notice (APPENDIX 5) will published on the College website.

## APPENDIX 1

# STANDARD COLLECTION NOTICE

1. Suncoast Christian College, (the College'), collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College.
2. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988*. We may ask you to provide medical reports about students from time to time.
5. The College may disclose personal and sensitive information for educational, administrative and support purposes. This may include to:
  - other schools and teachers at those schools;
  - government departments (including for policy and funding purposes);
  - International Network of Churches;
  - medical practitioners;
  - people providing educational, support and health services to the College, including specialist visiting teachers, sports coaches, SunArts teachers, volunteers, and counsellors;
  - providers of learning and assessment tools;
  - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
  - people providing administrative and financial services to the College;
  - anyone you authorise the College to disclose information to; and
  - anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of online or 'cloud' service providers is contained in the College's Privacy Policy.
8. The College's Privacy Policy, accessible on the College's website, sets out how parents or students may seek access to and correction of their personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have

an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.

9. The College's Privacy Policy also sets out how parents and students can make a complaint about a breach of the APPs and how the complaint will be handled.
10. The College may engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
11. On occasions information such as academic and sporting achievements, student activities and similar news is published in College newsletters and magazines, on our intranet and on our website, this may include photographs and videos of student activities such as sporting events, school camps and school excursions. The College will obtain permissions at the time of enrolment from the student's parent or guardian (and from the student if appropriate) to include such photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.
12. We may include students' and parent/guardian' contact details in a class list and College directory.
13. If you provide the College with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the College and why.
14. The information provided by an overseas student to the College may be made available to Commonwealth and State agencies and the fund manager of the ESOS Assurance Fund, pursuant to obligations under the *ESOS Act 2000* and the *National Code of Practice*.

**IMPORTANT:** Unless and until you advise us in writing that you do not consent to our use and disclosure of your personal information in the manner described in this notice, we will act on the basis that we have your consent to each such use and disclosure.

For further information on the College's Privacy Policy or to view a copy please contact the **Business Manager**.

## APPENDIX 2

### ALUMNI ASSOCIATION COLLECTION NOTICE

1. Suncoast Christian College, (the College'), may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of the College and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of Suncoast Alumni.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the College to assist in its fundraising activities. If you do not agree to this, please advise us now.
4. The College may publish details about you in our newsletters, magazines, on the intranet and on the College website. If you do not agree to this you must advise us now.
5. The College's Privacy Policy, accessible on the College website, contains details of how you may seek access to and correction of your personal information which the College has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.

### APPENDIX 3

## EMPLOYMENT COLLECTION NOTICE

1. In applying for this position you will be providing Suncoast Christian College, ('the College'), with personal information. We can be contacted by main PO Box 5254, SUNSHINE COAST MC QLD 4560 or email [info@suncoastcc.qld.edu.au](mailto:info@suncoastcc.qld.edu.au) or telephone (07) 5451 3600.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The College's Privacy Policy, accessible on the College website ([www.suncoastcc.qld.edu.au](http://www.suncoastcc.qld.edu.au)), contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted.
5. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.

#### APPENDIX 4

## CONTRACTOR/VOLUNTEER COLLECTION NOTICE

1. In offering, applying or agreeing to provide services to Suncoast Christian College, ('the College'), you will be providing the College with personal information. We can be contacted at PO Box 5254, SUNSHINE COAST MC QLD 4560, email [info@suncoastcc.qld.edu.au](mailto:info@suncoastcc.qld.edu.au) or telephone (07) 5451 3600.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for the term of the contract and thereafter, as required by the College.
4. The College's Privacy Policy, accessible on the College website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to.
6. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other personal information about you in accordance with these laws.
7. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.



## APPENDIX 5

# COLLEGE WEBSITES COLLECTION NOTICE

At Suncoast Christian College we are committed to high standards of conduct in all our business activities, which includes protecting your privacy in accordance with the applicable privacy law. This policy describes how we will manage your personal information in an open, transparent, and lawful way.

This Privacy Policy applies to the personal information we collect, store, maintain and use about you as our customers, visitors to our website and users and contributors to social media and other digital services, job applicants, and members of the public. By using our website, engaging with us (including via social media or other channels), or otherwise acquiring any product or service from us, you agree to and accept the contents of this Privacy Policy.

## Why do we collect and use your personal information?

When we refer to personal information, we mean information which identifies you as an individual or from which your identity can be reasonably determined.

We collect and deal with your personal information so that we can better:

- assist you with your transactions with us;
- inform you about, and improve our products, services, and experiences that we offer to you;
- support our business administration and related functions;
- accept/consider job applications;
- send you opportunities that may be of interest to you;
- assist with any enquiries you make;
- meet our legal obligations; and
- for other reasons you might reasonably expect us to use your personal information for.

Without your personal information, we may not be able to provide our products or services to you.

## What type of personal information do we collect?

When we collect and hold personal information, it may include details such as your name, address, email, telephone number, date of birth, gender, stated or likely preferences and interests (e.g. whether you may be interested in particular products or promotions), and any other details reasonably related to your experience (or dealings with us e.g. job applications).

## For Parents/Guardians of enrolled students

Protecting your privacy and the confidentiality of your personal information is important to us. The purpose of this notice is to make you aware of a range of matters relating to our ongoing collection, use and disclosure of your personal information and seek your consent for our use and disclosure of that information in the manner described below.

The College collects personal information, including sensitive information about students and parents/guardians before and during the student's enrolment at the College. The primary purpose of collecting this information is to enable the College to provide education for your child.

Some of the information we collect is to satisfy the College's legal obligations.

Certain laws governing or relating to the operation of the College require that certain information be collected.

Health information about students is sensitive information within the terms of the *Privacy Act 1998*. We ask you to provide medical reports about students from time to time.

From time to time the College may disclose personal and sensitive information to others such as other schools, government departments, medical practitioners, and people providing services to the College, for administrative and educational purposes.

If we do not obtain your personal information, we may not be able to enrol or continue the enrolment of your child.

Personal information collected from students is regularly disclosed to their parents/guardians. On occasions information such as academic and sporting achievements, student activities and other news and photos are published in College newsletters, magazines, yearbooks, website, advertising and other promotional materials, with permission for the College to use this information being expressly provided by Parents in the Enrolment Agreement. If parents subsequently wish to alter permission for the publication of information about their child/children, then they must advise us in writing immediately.

Parents may seek access to personal information collected about them and their child by writing to the Principal. Students may seek access to their own personal information. There will be occasions access is denied, such as where access would have an unreasonable impact on the privacy of others or result in a breach of the College's duty of care to the student or where students have provided information in confidence.

The College engages in fundraising activities from time to time. Information received from you may be used to make an appeal to you or disclosed to organisations that assist the College's fundraising, solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes, without your consent.

We may include your contact details in a class list or College directory. If you do not agree with this, you must advise us in writing immediately.

If you provide the College with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and that they can access that information if they wish and that the College does not usually disclose that information to third parties.

**IMPORTANT:** Unless and until you advise us in writing that you do not consent to our use and disclosure of your personal information in the manner described in this notice, we will act on the basis that we have your consent to each such use and disclosure.

### Message to Parents/Guardians of enrolled students

Our service provider makes a record of your visit and logs your server address, your top-level domain name and the date and time of your visit to this site. No attempt will be made to identify you or your browsing activities except in the event of an investigation in which a law enforcement agency exercises a warrant to inspect the service provider's logs.

We will only record your email address if you send us a message. It will only be used for the purpose for which you have provided it and will not be added to a mailing list. We will not use your email address for any other purpose not disclose it, without your consent.

**Note:** through our website CRM software, Hubspot, we actually can track the browser activities of users within our website. However, this is limited to those people who provide explicit, unambiguous consent (allowing us to communicate with them) when they complete a web form submission on our sites; [suncoastcc.qld.edu.au](http://suncoastcc.qld.edu.au) and [suncoastlittleleaners.com.au](http://suncoastlittleleaners.com.au). This tracking of browser activity is limited to their activity within these two websites only, and does not extend beyond those websites, i.e. we are not tracking their activity once they leave the websites. This true of existing enrolled students and their parents – that is, we are NOT tracking their activity within these websites.

## How do we collect your personal information?

### General collection

We may collect personal information about you during your interactions with us including when:

- you make an enquiry with us;
- you participate in a survey, promotion or competition; and you visit or contribute to our online channels such as our website, social media platforms and other digital services.

### Cookies

We may use a technology called "cookies". A cookie is a tiny element of data that websites can send to your browser, which may then be stored on your device so we can recognise you when you return. We use cookies to improve the quality of our Service, including for storing user preferences, improving ad selection, and tracking user trends. You may set your Web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from us, you may not be able to take advantage of all of the features of our Services.

### Social media and other third-party websites

We use a number of third-party websites and social media platforms including Facebook, Instagram, Twitter, LinkedIn, and YouTube.

We may make use of any information that you make public when you use any such services or platforms. Such information available for use by us may include images and text relating to us or our products, services, promotions, events, and memberships.

## How do we use your personal information?

### General use

We may use your personal information to communicate with you or respond to an enquiry, complaint, application, and to fulfil any orders.

### Direct marketing

We may use or disclose your personal information for direct marketing purposes - if you have provided your information for that purpose, or if you have subsequently provided consent for your information to be used in this way.

We may contact you from time to time (by mail, telephone, email, SMS, social media platforms or any other appropriate means) with information about our products and services which we think may be of interest to you. We may also provide relevant marketing to you whether directly or through online advertisement networks or other third parties services such as those operated by Google, based on your browsing activities, information collected by surveys, website analytics, online behavioural advertising, and other means.

You may choose not to receive direct marketing communications from us by 'opting-out'. Each of our direct marketing materials will tell you how to do this and we will comply with your request within a reasonable timeframe.

### Surveys and Customer Research

From time to time, we may offer you the opportunity to participate in one of our surveys or other customer research. We use this information to help us understand our customers and to enhance our product and service offerings and promotions.

## Sharing your personal information

We may need to disclose your personal information to third-parties who perform functions or services in connection with our business, such as:

- delivery;
- product repair or recall;
- payment processing;
- marketing;
- banking;
- mailing functions;
- gateway provision;
- insurance;
- document management;
- information technology services including data storage, hosting and security;
- employment matters;
- for operation of our websites; or
- where we are otherwise required to by law.

We may also disclose to other third parties where you have specifically consented to the disclosure of information to those third parties.

We will not disclose, trade, rent, sell or otherwise transfer your personal information, without your consent, except as otherwise set out herein.

## Third-party website links

When you use our services, you may be presented with links to websites that we do not own or operate. Except as provided herein, we will not provide any of your personal information to these third parties without your consent. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organisations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information. We may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our content and services.

## How do we secure your personal information?

### Our website

Even though our websites are professionally hosted and operate in a secure environment, there is always a risk in transmitting your personal information via the Internet. To make sure you are accessing a secure server, please check for the unbroken key or closed lock symbol generally located either at the bottom left or top left of your browser window. You can also check this by looking at the URL. If the URL is secure, then the first characters will read 'https' rather than just 'http'.

### Security of your personal information

We will take reasonable steps to protect your personal information, including from misuse, interference and unauthorised access or disclosure. We require our team members to adhere to our internal information security policies to safeguard your personal information at all times.

If we no longer need your personal information, then we may destroy or de-identify the information. If we become aware that your information has been subjected to unauthorised access, we will report such breach as required by law.

We hold personal information in a number of ways, including:

- as part of customer records and other electronic documents which are stored in our information technology systems and servers or those operated by third parties who provide services to us in connection with our business; and
- by securely storing hard copy documents at our various premises and using third-party document management and archiving services.

### Remaining anonymous

When practicable, you may choose not to identify yourself when dealing with us. You also may elect to use a pseudonym to protect your identity.

## How do you access and correct your personal information?

If you wish to access or correct any of your personal information we hold, please contact our Privacy Officer whose details are located below. We will provide you with access to your personal information in a reasonable period of time, except in limited circumstances (such as if the access would pose a serious threat to the life, health or safety of another person or where such access would unreasonably impact on the privacy of others).

Before we provide you with access to your personal information we will require proof of identity. Please provide as much detail as you can about the information you are requesting, in order to help us retrieve it. If we refuse your request or are unable to provide you with access to your personal information or are unable to provide it in the manner requested by you, we will provide a written response outlining our reasons.

Sometimes your personal information that we hold will become out of date. Please immediately advise us of any change to your personal information and we will amend our records accordingly.

### Obtaining a copy of this policy

The current version of this Privacy Policy is available on our website. If you need a copy of this Privacy Policy in a different form, please ask us and we will try to meet your request. If we make any changes to this Privacy Policy, we will place the updated policy on our website.

## Changes to this Privacy Policy

This Privacy Policy may be updated periodically to reflect changes to our personal information practices. The revised Privacy Policy will be presented when you sign-in to use the Services. We strongly encourage you to please refer to this Privacy Policy often for the latest information about our personal information practices.

This Privacy Policy was last updated on 8 June 2020.

## What if you are not happy with how we treat your personal information?

If you have any questions or would like to raise any concerns about your personal information, please email, or write to us. As always, we value your feedback and ideas.

E-mail: [info@suncoastcc.qld.edu.au](mailto:info@suncoastcc.qld.edu.au)

Post: Suncoast Christian College Privacy Officer, SUNSHINE COAST MC, Queensland 4560, Australia

If you make a complaint with us regarding your personal information, we will aim to respond to your complaint within 30 days. If you are not happy with our response, please let us know and we will aim to address any further concerns you have. If you are still not happy with our response, you may wish to contact the Office of the Australian Information Commissioner (OAIC), whose details are listed below.

## Further information on privacy

You can obtain further general information about your privacy rights and Australian Commonwealth privacy law by contacting the OAIC:

Post: GPO Box 5218 Sydney NSW 2001  
Telephone: 1300 363 992  
Fax: +61 2 9284 9666  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)





**SUNCOAST**  
CHRISTIAN COLLEGE



[www.suncoastcc.qld.edu.au](http://www.suncoastcc.qld.edu.au)

T. 07 5451 3600  
F. 07 5442 2212

E. [info@suncoastcc.qld.edu.au](mailto:info@suncoastcc.qld.edu.au)  
A. Cnr Schubert & Kiel Mtn Road, Woombye Q 4559 | PO Box 5254, Sunshine Coast MW Q 4560



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