



Policy Number ADV003

PRIVACY POLICY

Rationale

1. Ormond College Limited including the Wade Institute (referred to as **Ormond College, we, us** or **our**) has implemented this Privacy Policy to provide information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 45.
2. From time to time, Ormond College may be related to other companies and entities (related entities). This Privacy Policy applies to the use of your Personal Information by us and by those related entities. Those related entities may also have their own privacy policies which set out additional detail or differences in their privacy practices. To the extent that those privacy policies are inconsistent with this Privacy Policy, those privacy policies will prevail over this Privacy Policy in relation to the actions of those related entities. A reference in this Privacy Policy to Ormond College, we, us or our is also a reference to those related entities.

Policy Guidelines

Personal Information

3. "Personal Information" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

What Personal Information do we collect and hold?

4. The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information that we collect may include (but is not limited to) the following:
 - (a) name
 - (b) age and/or date of birth
 - (c) contact details including telephone numbers (landline and/or mobile)
 - (d) current and previous address (including postal address)
 - (e) email address
 - (f) gender
 - (g) identification information such as driver's license, working with children check, police check

- (h) bank account details
- (i) occupation and employment details including employment status and any previous work experience
- (j) information from or in connection with your resume or job application if you apply for a position with us
- (k) University of Melbourne student number
- (l) information from or in connection with your residency application to Ormond College
- (m) academic information, including opinions about your academic performance and previous education
- (n) psychometric testing information
- (o) information obtained by us relevant to your residency
- (p) medical and emergency contact information
- (q) passport and visa details, and
- (r) photographs and/or images of you from camera footage
- (s) information regarding your access to various parts of the college, collected by smart badge readers
- (t) investor type, investment history and project investment budget [for applicants for VC Catalyst]
- (u) Information collected through the provision of counselling or psychology services, including the following:
 - (i) information about when you visit and make contact with a staff member of the counselling and psychology service,
 - (ii) information relating to your support plan and your progress towards achieving your goals,
 - (iii) information about your wellbeing, mental health, physical health and your use of substances,
 - (iv) any information you provide about your experiences or history that affects your wellbeing,
 - (v) information about your academic and future employment goals,
 - (vi) any information provided to us that relates to your care and support.

5. We collect and record Personal Information about individuals such as:

- (a) our students, prospective students, alumni and their representatives
- (b) our suppliers and potential suppliers and their representatives, directors, partners, proprietors and shareholders
- (c) contractors and subcontractors and potential contractors and subcontractors and their representatives in relation to providing goods and services to us
- (d) our employees past and present, including applicants, and
- (e) any other person who comes into contact with Ormond College.

How and when do we collect Personal Information?

6. We collect your Personal Information to allow us to conduct our business functions, to provide, market and sell our services and for the specified purposes set out in paragraph 21. In some circumstances the collection of Personal Information may be required by law.

7. We may collect your Personal Information in the course of providing you with services, or:
 - (a) when you submit a residency application to us
 - (b) when you use or buy our services
 - (c) when you provide us, or you offer or apply to supply us, with goods or services
 - (d) when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card)
 - (e) when you request information about us, or our services
 - (f) when you provide feedback to us
 - (g) when you visit or fill in a form on our Website (see paragraph 14)
 - (h) when you visit premises from which we operate
 - (i) when you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our business operations
 - (j) when you submit a job application to us,
 - (k) when you otherwise contact us by telephone, fax, email, social media, post or in person, or
 - (l) where we are otherwise required or authorised by law to do so.

8. The College may also collect, use or disclose personal information where it is 'reasonably necessary' to prevent harm, including:
 - (a) to lessen or prevent a serious threat to the life, health, safety or wellbeing of any person, or to public health;
 - (b) to enable the College to discharge its duty of care;
 - (c) to enable the College to discharge its obligations to provide and maintain a safe environment, and to prevent and respond to sexual harm.

9. Generally, when providing our services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect personal information directly from the relevant individual where reasonable and practicable.

10. We may also collect Personal Information about you from third parties and other sources such as:
 - (a) your nominated representatives (e.g. spouse, accountant, power of attorney, brokers and other professional advisors)
 - (b) publicly available sources of information
 - (c) related entities, companies and businesses of Ormond College,
 - (d) the Victorian Tertiary Admissions Centre, or
 - (e) your nominated referees

but we will only collect your Personal Information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.

11. If the Personal Information we collect includes sensitive information, including health information, we will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.

12. Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

13. In most cases, if you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information

we require, we may not be able to process your admission or entrance to Wade Institute or Ormond College program application, allow you to access the Wade Institute or Ormond College, provide you with requested information or services, or to effectively conduct our relationship with you.

Information collected via our Website

14. Personal information may be collected by us and by our third party service providers who assist us in operating our Websites at <https://www.ormond.unimelb.edu.au/>, including its subdomains and any other website we operate from time to time (collectively the Website).
15. We may use various technological methods from time to time to track the visiting patterns of individuals accessing our Website.

Google Analytics

16. We use Google Analytics to help analyse how you use our Website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Website. Google will store this information. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personally identifiable information of visitors to our Website. We will not associate any data gathered from this Website with any personal information from any source as part of our use of Google Analytics.
17. If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>

Click Stream Data

18. When you read, browse or download information from our Website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. This information is used for statistical, reporting and website administration, maintenance and improvement purposes only and will not be used to identify you.

Web Beacons

19. Web beacons are images that originate from a third party site to track visitor activities. We use web beacons to track the visiting patterns of individuals accessing our Website.

How do we use your Personal Information?

20. We use the Personal Information we collect about you for our business functions and activities, in order to operate our business efficiently, and to market our services for the benefit of our students, alumni, staff and employees.
21. We may collect, hold and use your personal information:
 - (a) to identify and communicate with you

- (b) to enable us to provide you with requested information or services, including educational and residential services
- (c) to otherwise assist current and prospective students by providing them with information and support
- (d) to manage and administer our admissions process, including to assess applications for scholarship, prizes or student eligibility for financial assistance
- (e) to manage and administer your residency
- (f) to collect and process payments, including fees and donations
- (g) to assist student participation in sporting, social or cultural activities offered by us
- (h) to assess your performance or conduct
- (i) to manage any investigation in which you are involved
- (j) to refer you to another College
- (k) to provide references at your request to third parties such as real estate agents or potential employers
- (l) to help us to manage and enhance services we provide to you
- (m) to help us to manage and enhance goods and services we procure from our suppliers and subcontractors
- (n) to personalise and customise your experiences on our Website
- (o) to establish membership of the Ormond College Association (OCA)
- (p) to manage and administer our alumni database, including to inform members of the OCA about alumni activities
- (q) to publish details about OCA members in the OCA newsletter, 'New & Old'
- (r) to undertake fundraising activities and events
- (s) to promote and market our services to you
- (t) to provide you with information that we believe may be of interest to you or that you may be interested in receiving, including advertising material, regarding us, our clients, and our business partners
- (u) to conduct research for the purposes of improving existing services or creating new products or services to help us research the needs of our customers to enable us to market our products and services with a better understanding of your needs and the needs of students
- (v) to notify and assess insurance claims, pay settlements and finalise claims, and determine liability
- (w) to protect you and us from fraud
- (x) to provide for the safety and security of our students, workers and onsite visitors
- (y) to help us manage our business operations
- (z) for business support purposes including maintenance, backup and audit
- (aa) to process any job application submitted by you
- (bb) to respond to any queries or complaints you may have, or
- (cc) to comply with our statutory and legal obligations.

22. We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.

23. You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.

24. We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Policy or any agreement you enter into with us, or

- (b) required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).

When do we disclose your Personal Information?

- 25. Ormond College may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraphs 1 and 2. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).
- 26. We may also disclose your Personal Information to:
 - (a) any of Ormond College's internal divisions, business units or departments
 - (b) Ormond College staff, advisers, tutors and College Council
 - (c) The University of Melbourne and other Colleges
 - (d) referees nominated by you
 - (e) your nominated representatives, including medical and emergency contacts
 - (f) other organisations or individuals who assist us in providing services to you
 - (g) professional service providers and advisors who perform functions on our behalf, such as lawyers and our auditors
 - (h) medical providers including medical and rehabilitation practitioners for assessing insurance claims
 - (i) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development), and
 - (j) Government, regulatory authorities and other organisations as required or authorised by law (such as Centrelink or the Police).
- 27. We may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.
- 28. We may also disclose your Personal Information to a purchaser or potential purchaser in connection with the sale or potential sale of Ormond College, our business or any of our assets, including in insolvency, in circumstances which require the purchaser or potential purchaser to use such Personal Information consistently with this Privacy Policy.

Overseas disclosures

- 29. Generally, we do not send or disclose your Personal Information to overseas recipients. We may however in future, from time to time, disclose your Personal Information to overseas recipients. If this occurs we will update our Privacy Policy to reflect this. For example, this may happen if:
 - (a) we outsource certain activities overseas
 - (b) our transactions, information, services, products have an overseas connection, or
 - (c) our computer systems including IT servers are located overseas.
- 30. You consent to the collection, use, storage, and processing of your Personal Information outside of Australia as set out in this Privacy Policy.

Other uses and disclosures

31. We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect or use your Personal Information.

Marketing

32. Where you have given consent, we will use your Personal Information for sending you information, including promotional material, about us or our services, as well as the products and services of our related entities and third parties, now and in the future. We may send you such information by means of direct mail, email, SMS and MMS messages.
33. If you do not want to receive marketing information from us, you can unsubscribe in any of the following ways:
 - (a) clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us
 - (b) contacting us using the contact details specified in paragraph 45.

Storage and security of Personal Information held by us

34. We aim to keep your Personal Information secure. Any Personal Information that is collected via our websites or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption etc) and procedural methods.
35. If we find that we no longer require or have no further need for your Personal Information we may de-identify it or remove it from our systems and destroy all record of it.

How you can access and update your Personal Information

36. You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. Depending on the nature of the request, Ormond College may charge for providing access to this information, however such charge will not be excessive. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.
37. A request for access can be made by contacting our Privacy Officer in any of the ways specified in paragraph 50.
38. We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.
39. Please contact us in any of the ways specified in paragraph 45 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.
40. It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

How do we deal with complaints about privacy?

41. If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy, please contact our Privacy Officer in any of the ways specified in paragraph 45 and advise us as soon as possible. We will investigate your queries and privacy complaints within a reasonable period of time, depending on the complexity of the complaint.
42. It would assist us to respond to your complaint promptly if it is made in writing. Please detail information relevant to your complaint.
43. We will notify you of the outcome of our investigation.

Updates to this Privacy Policy

44. We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy, posted on our Website at: <https://www.ormond.unimelb.edu.au/privacy> where the Privacy Policy will be located. Any changes to this Privacy Policy may be advised to you by updating this page on our Website. We encourage you to check this page from time to time for any changes.

What to do if you have a question, problem or want to contact us about our use of your Personal Information or this Privacy Policy

45. If you:
 - (a) have a query or concern about this Privacy Policy or our Personal Information handling processes
 - (b) wish to make a complaint in relation to a breach of your privacy
 - (c) would like to access your Personal Information held by us
 - (d) would like to update or correct your Personal Information held by us, or
 - (e) would like to opt out of direct marketing,

please contact our Privacy Officer in any of the following ways:

Ms Di Bambra, Vice Master Ormond College
Email Address: privacy@ormond.unimelb.edu.au
Mailing Address: 49 College Crescent, Parkville VIC 3052
Phone: (03) 9344 1100.

This Privacy Policy was last updated in January 2020.