



This privacy policy sets out the way in which we handle personal information.

1. Privacy Policy

Janison is bound by and we are committing to protecting your privacy and handling your personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) and this privacy policy.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

2. Personal Information

Personal information means any information that can be used to personally identify you and may include your name, address, telephone number, email address, date of birth and profession or occupation. We collect personal information in the course of providing access to our learning and assessment systems and generally conducting our business. The type of information that we collect will vary depending on our interaction with you and may include:

- Name
- Employer organisation
- Title or position
- Address, either business or personal
- Email address
- Phone number
- Date of birth
- Other information provided by you or your organisation when accessing our learning and assessment systems.

3. Sensitive Information

We will not collect sensitive information about you unless:

- (a) you consent to giving us that information; or
- (b) we are required by law to collect that information.

4. Collection

4.1 We will not collect personal information unless the information is necessary for one or more of our functions or activities, for the conduct of our business and to manage our relationship with you or your organisation.

4.2 We will collect personal information only by lawful and fair means and not in an unreasonably intrusive way.

4.3 We collect personal information about you in the following circumstances:

- when you access any of our services either directly or through a third party deliverer;
- when we respond to your enquiries and requests;
- during conversations or email exchanges between you and our representatives;

- when we conduct our business and administrative functions;
 - when we respond to any helpdesk or other service requests from you or your organisation;
 - when we respond to any complaints from you or your organisation;
 - when you access our learning or assessment system.
- 4.4 We may collect personal information directly from you, through a contact in your company or organisation, or through a third party with whom you are dealing and who has informed you that your personal information will be provided to us.
- 4.5 Janison will take reasonable steps to ensure that you are aware of:
- a. the identity of Janison and how to contact us; and
 - b. the fact that you are able to gain access to the information; and
 - c. the purposes for which the information is collected.
- 4.6 If you do not provide us with your personal information we may not be able to provide you with our services, communicate with you or respond to your enquiries.

5. Use and Disclosure

- 5.1 We collect, hold, use and disclose personal information for the following purposes:
- to manage and maintain our business relationships;
 - to respond to enquiries and requests;
 - to respond to helpdesk requests or other service requests;
 - to communicate with you or your organisation;
 - to improve our services;
 - to provide access to our learning and assessment systems;
 - to maintain and update our records;
 - to improve our services;
 - to provide you with information, including marketing information, about our services and products;
 - to assess the performance of our website and our learning and assessment systems;
 - to process and respond to privacy complaints; and
 - to comply with any necessary legal requirement.
- 5.2 We may disclose your personal information to:
- our employees and to any third parties from whom you are receiving our services but only to the extent required to maintain our services to you or to your organisation;
 - to our related bodies corporate;
- 5.3 We may also disclose your personal information to others (outside our related bodies corporate) where:
- a. we are required or authorised by law to do so;
 - b. you may have expressly consented to the disclosure or your consent may be reasonably inferred from the circumstances; or
 - c. we are otherwise permitted to disclose the information under the Privacy Act.

- 5.4 We will not use or disclose personal information about you for any other purpose unless:
- a. you consent to the use or disclosure; or
 - b. the use or disclosure is required or authorised by or under law.
- 5.5 If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

6. Data Quality

We will take reasonable steps to make sure that the personal information that we collect, use or disclose is accurate, complete and up-to-date.

7. Data Security and Storage

- 7.1 We will only store personal information for the purpose of managing and maintaining our business relationships and for so long as your personal information is relevant to you or your organisation conducting business with us.
- 7.2 We will not store any sensitive information about you without your consent.
- 7.3 We will take reasonable steps to protect your personal information from misuse and loss and from unauthorised access, modification or disclosure using a combination of physical, administrative and technological safeguards.
- 7.4 We will take reasonable steps to delete or permanently de-identify your personal information if it is no longer needed for any purpose for which the information may be used or disclosed under Australian Privacy Principles.
- 7.5 As the internet is inherently insecure, we are not able to guarantee the security of information that you communicate to us online or that is intercepted during transmission over the internet. Consequently any personal or other information transmitted to us online is at your own risk.

8. Access and Correction

- 8.1 If we hold personal information about you, we will provide you with access to the information on request by you where it is reasonable and practical to do so except in circumstances where we are entitled to deny access under the Privacy Act, for example:
- a. if providing access would have an unreasonable impact upon the privacy of other individuals; or
 - b. the request for access is frivolous or vexatious; or
 - c. the request for access is unlawful;
 - d. where the request would result in a breach of confidentiality.
- 8.2 You may request that we correct any personal information data held by us if it is incomplete, inaccurate or out of date.
- 8.3 There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).
- 8.4 Any request for correction or access should be made in writing to our Privacy Officer using the contact details set out below and our Privacy Officer will respond within 30 days after receiving your request.
- 8.5 If any access for request is denied to you, then we will provide you with written reasons for refusal together with the mechanisms available to you to complain about our refusal.

- 8.6 We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date and complete.

9. Identifiers

- 9.1 We will not adopt as our own identifier your identifier that has been assigned by:
- a. an agency; or
 - b. an agent of an agency acting in its capacity as agent; or
 - c. a contracted service provider for a Commonwealth contract acting in its capacity as contracted service provider for that contract.
- 9.2 However, subclause 9.1 does not apply to the adoption by us of a prescribed identifier in prescribed circumstances.
- 9.3 We will not use or disclose an identifier assigned to you by an agency, or by an agent or contracted service provider mentioned in subclause 9.1, unless:
- a. the use or disclosure is necessary for us to fulfil our obligations to the agency; or
 - b. the use or disclosure is by us of a prescribed identifier in prescribed circumstances.
- 9.4 In this clause: identifier includes a number assigned by us to an individual to identify uniquely the individual for the purposes of our operations. However, an individual's name or ABN (as defined in the A New Tax System (Australian Business Number) Act 1999) is not an identifier.

10. Complaints Procedure

- 10.1 If you have concerns about how your personal information is being handled by us or if you wish to make a complaint about a breach of the APPs by Janison, please send your complaint in writing addressed to the Privacy Officer at Janison using the contact details set out below.
- 10.2 Our Privacy Officer will respond to you in writing within 30 days after receiving your complaint advising you of what action we will take in response to your complaint or alternatively setting out the reasons why we consider that there has been no breach of the Privacy Act or the APPs.
- 10.3 Any complaint must first be made in writing directly to us. If you are not satisfied with our decision then you may approach an independent advisor or contact the Office of the Australian Information Commissioner (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

11. Accessing our Learning Platform

- 11.1 When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit and allows us to:
- a. measure traffic patterns; and
 - b. determine which areas of the system have been visited;
 - c. monitor activity.

You can set your browser to reject cookies if you wish. We do not use cookies to track your internet activity before or after you leave the Janison environment.

- 11.2 We may log IP addresses (the electronic addresses of computers connected on the internet to:

- a. analyse trends
- b. administer the website
- c. track user movements
- d. gather broad demographic information

11.3 Our system may contain links to third party websites and we make no representations or warranties in relation to the privacy practices of any third party website nor are we responsible for the privacy policies or the content of any third party websites. You should take steps to satisfy yourself as to the security and practices of those websites.

12. Changes to our privacy policy

We may make changes to our privacy policy from time to time. Any updated versions will be posted on our website. Please review the document that you will find in the Privacy Policy link regularly. This Policy was last updated on 1 June 2015.

Contacting us

If you have any questions about this privacy policy, please contact our Privacy Officer as follows:

The Privacy Officer, email: privacy@janison.com.au; phone: 1300 857 687
