

## Privacy Policy

Boyle Consulting Pty Ltd (ABN 46 010 866 985) recognise your right to privacy and appreciate your concern about the security of your personal information. (References to “we”, “us” and “our” refer to Consulting Pty Ltd and “you” and “your” are references to the individual who is the subject of personal information submitted to us.)

By accessing and using our Website or by submitting information to us or providing information to third parties which is then submitted to us, you consent to our collection, use and disclosure of information in accordance with this Privacy Policy. We will only collect information by lawful and fair means.

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.

### Why we collect personal information?

We collect personal information about our clients, learners, customers, suppliers, contractors, job applicants and other contacts that is reasonably necessary for, or directly related to the delivery of the services we offer. This information enables us to:

- a) understand and meet their needs
- b) conduct our activities; and
- c) meet legal obligations.

### What personal information do we collect?

The personal information we collect may include your name, address, email address, fax and telephone number, passport details (if you are an employee or subcontractor), information about your employer or the organisation that nominated you (if you are a learner), and any feedback that you provide to us about our products and services, our website, or other matters.

Should “sensitive information” be collected, the handling of that information is detailed in the section below ‘*Sensitive information is subject to greater restrictions*’.

Personal information is collected by way of forms filled out by you (including online forms), emails, telephone conversations, online user-generated content and market research, face-to-face meetings and interviews, and where information is submitted to us automatically as a result of the exchange of data between systems. Where necessary and with your consent, we supplement the information we receive from you with information from third party sources, such as your employer or nominating organisation (if you are a Learner).

If we receive unsolicited personal information that could have been lawfully collected by us as solicited information, we will treat that submitted information in the same way as we treat solicited information. If we receive unsolicited personal information that could not have been lawfully collected by us as solicited information, we will destroy or de-identify that information as soon as practicable.

We can collect statistical information about visitors to our website. This information is not used to identify particular individuals.

Where you choose not to provide the information we need to fulfill your request for a specific service or product or information, or to participate in training activities, we may not be able to provide you with the requested service or product or information.

### How we might use and disclose your personal information?

We use and disclose your personal information for the primary purpose of collection, or for reasonably expected secondary purposes which are related to the primary purpose, or for purposes to which you have consented, and in other circumstances authorised by the Privacy Act.

Generally, we use and disclose your personal information for a range of purposes. For Learners and/or client representatives this includes to:

- provide you with our products or services that you or your employer have requested;
- contact customers and learners about needs for our products and services;
- facilitate your participation in training programs in various capacities;
- undertake market research by inviting people to participate in a survey;
- collect and/or refund course fees;
- maintain academic and training records of learners;
- fulfil State and Commonwealth Government reporting and statistical obligations;
- carry out day-to-day administrative matters;
- respond to your queries or feedback;
- inform learners about events, changes in course schedule, new courses, and new service; and
- inform learners and customers of new courses, products or services;
- inform you about developments in our products, services, activities and programs that are potentially useful to you;

- provide you with any communications or publications in which we think you might be interested, or which you have requested;
- send marketing communication such as brochures, sales letters, and flyers.

We also use and disclose personal information related to shortlisted job applicants who apply for jobs via different channels.

We will not sell submitted information to third parties or intentionally disclose submitted information to third parties except as specified in this policy, as required by law or to the extent that you have consented to such disclosure.

#### **Disclosure of personal information to other parties**

We disclose your personal information to third parties including our external service providers that provide services to us (such as contracted consultants/facilitators), your employer or nominating organisation, government, statutory or regulatory bodies for the purposes set out above.

We also disclose your personal information if it is required or authorised by law, where disclosure is necessary to prevent a threat to life, health or safety, or where we are otherwise permitted by the Privacy Act.

We do not sell or license your personal information to third parties.

#### **Sensitive information is subject to greater restrictions**

Your sensitive information is used or disclosed for the primary purpose of collection, or for reasonably expected secondary purposes which are directly related to the primary purpose, or for purposes to which you have consented or where disclosure is necessary to prevent a threat to life, health or safety.

Sensitive information means:

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

#### **Security and management of personal information**

Boyle Consulting will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- limiting access to the information we collect about you (for instance, only personnel who need your information to carry out our business activities are allowed access);
- requiring any third party providers to have acceptable security measures to keep personal information secure; and
- putting in place physical, electronic, and procedural safeguards in line with industry standards.

If we no longer require your personal information and are not legally required to retain it, we will take reasonable steps to permanently destroy or de-identify that personal information.

You acknowledge that our back-up procedures may make it impractical to locate and destroy or de-identify copies of your personal information which are stored off-line or in a form which does not readily permit location and modification of data and you consent to our continued retention of submitted information in these circumstances.

#### ***Links from our website to other websites***

Cookies are used in connection with your use of our Website. A cookie is a small amount of data that some websites place on your computer when you visit them. A website may use cookies to track the pages you have visited. We will not use cookies to identify you personally.

When you visit our Site, our servers may record a range of information relating to your access and use of the Site (collectively called "clickstream data"). We may examine clickstream data to determine the traffic through the server as well as access levels to specific pages. No attempt will be made to identify you or your browsing activities from clickstream data except where it is suspect that

unauthorised access or use of our Website has occurred or may occur or be attempted. Under such circumstances we may gather, use and disclose more extensive information than indicated above regarding access or attempted access to our Website for the purposes of prevention, detection, investigation or prosecution.

If you submit information to any third party website accessed through a link from our website, the privacy principles applying to any information you submit to that site are outside our control and therefore we are not responsible for the collection or handling of personal information by the operators of that third party website. You should check the privacy policies of any other site before submitting information to that site.

#### **Accessing the information we hold about you**

You have the right to request access to the personal information that we hold about you. To make a request to access this information, please contact us in writing. You will need to verify your identity and specify what information you require.

#### **Updating your personal information**

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. We will take reasonable measures to ensure all personal information held about you is accurate, complete, relevant and up-to-date.

We will provide you with access to your personal information on reasonable request and subject to your agreement to pay our access charges and adequate proof of your identity if (a) it is practicable for us to do so and we have no other reasonable grounds for refusing access, (b) the request is not frivolous or vexatious, (c) access will not have an unreasonable impact on the privacy of others, (d) the information does not relate to existing or anticipated legal proceedings (other than information accessible through the discovery process), (e) access will not reveal our intentions in relation to any negotiations with you, (f) access is not unlawful (g) denying access is not required or authorised by law, and (h) access will not prejudice any prevention, detection, investigation or prosecution of possible unlawful or improper activity.

You have the right to require us to correct errors in your personal information.

We will correct any errors in your personal information upon receipt of written evidence from you which satisfies us that a correction is required.

#### **Sending information overseas**

Personal information is sent overseas in limited circumstances, including to your employer or nominated organisation; and external service providers that assist our organisation with the provision of training and consulting services, and the distribution of results by Boyle Consulting.

We will not provide access to your personal information to a recipient outside Australia except for the primary purpose of collection, or for reasonably expected secondary purposes which are related to the primary purpose.

#### **Complaints or Concerns**

Any questions relating to this Privacy Policy or concerns that the privacy or integrity of personal information has been compromised, should be directed by email to [info@boyleconsulting.com.au](mailto:info@boyleconsulting.com.au). We will respond promptly to all correspondence.