

*Exceed Your
Expectations*



Corinda Alumni Association

Privacy Policy

2019

CRICOS Number 00608A
Provider: Department of Education

46 Pratten Street
Corinda QLD 4075

T: 3379 0222
E: info@corindashs.eq.edu.au
W: www.corindashs.eq.edu.au



Corinda Alumni Association

Complete Privacy Policy

Contents

Complete Privacy Policy.....	2
1 Introduction	4
1.1 Who should read this privacy policy?	4
1.2 Purpose of this privacy policy	4
1.3 <i>Privacy Act 1988</i>	5
1.4 Information covered under this privacy policy	5
2 Our Personal Information Handling Practices.....	5
2.1 Collection of personal information	5
2.2 Types of personal information collected by us.....	6
2.3 Collection of sensitive information	7
2.4 Collecting personal information from children and young people.....	7
2.5 Collection of unsolicited information	7
2.6 How we collect personal information.....	8
2.7 Remaining anonymous or using a pseudonym	8
2.8 Information collected by our contractors.....	8
2.9 Storage and data security	8
2.9.1 Storage	8
2.9.2 Data security	9
2.10 Data quality.....	9
2.11 Purposes for which information is collected, held, used and disclosed	9
2.12 Our website.....	10
2.12.1 Log information (browsing).....	10
2.12.2 Cookies.....	10
2.12.3 Collection and Analytics.....	11
2.12.4 Links to External Websites and Social Networking Services	11
2.12.5 Electronic communication	11



2.13	Disclosure of personal information to other Commonwealth agencies providing services to the department.....	12
2.14	Disclosure of personal information overseas	12
2.15	Unauthorised access, use or disclosure of personal information.....	12
3	Accessing and Correcting Your Personal Information	13
3.1	How to seek access to and correction of personal information	13
3.2	Our access and correction process	13
3.3	If you are unsatisfied with our response	13
4	Privacy Impact Assessments	14
4.1	What is a Privacy Impact Assessment.....	14
4.2	When we conduct Privacy Impact Assessments.....	14
5	Complaints	14
5.1	How to make a complaint.....	14
5.2	Our complaint handling process	14
5.3	If you are unsatisfied with our response	14
6	Contact Us.....	15
6.1	General enquiries, complaints, requests for access or correction	15
6.2	Availability of this privacy policy.....	15
7	Privacy Policy Updates	15



1 Introduction

The Corinda Alumni Association Inc. was formed as a way to connect past staff, students and community members to Corinda State High School. We collect personal information solely for our own records and these will not be distributed under any normal circumstance.

More information is available on the Corinda SHS [website](#).

1.1 Who should read this privacy policy?

You should read this privacy policy if you are:

- a student;
- a parent or guardian;
- a principal or teacher;
- an academic or researcher;
- a participant in a program or service delivered by us;
- a policy stakeholder who works with us;
- a person whose information may be given to us by a third party, including other Australian Government agencies;
- an entrant in a competition conducted by us;
- a current or past employee;
- any other individual whose personal information we may collect, hold, use and disclose from time to time.

1.2 Purpose of this privacy policy

The purpose of this privacy policy is to:

- describe the types of personal information that we collect, hold, use and disclose;
- outline our personal information handling practices;
- explain our authority to collect your personal information, why it may be held by us, how it is used and how it is protected;
- notify whether we are likely to disclose personal information to overseas recipients and, if possible, to whom;
- provide information on how you can access your personal information, correct it if necessary and complain if you believe it has been wrongly collected or inappropriately handled.

This privacy policy has been developed to follow the 'layered policy' format, which means that it offers layers of greater or lesser detail so people can read as much as they wish and find what they need fast.

Full details of these practices are contained in this document.



1.3 Privacy Act 1988

The school, including its employees, contractors and agents, is subject to the [Privacy Act 1988](#) (the Privacy Act) and to the requirements of the Australian Privacy Principles (APPs) contained in the Privacy Act.

The APPs regulate how federal public sector agencies and certain private sector organisations can collect, hold, use and disclose *personal information* and how you can access and correct that information.

'Personal information' means any information (or an opinion) about an identified individual or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.¹

The APPs only apply to information about living individuals, not information about corporate entities such as businesses, firms or trusts. Detailed information and guidance about the APPs can be found on the website of the Office of the Australian Information Commissioner - <http://www.oaic.gov.au/>.

1.4 Information covered under this privacy policy

This privacy policy has been developed in accordance with Australian Privacy Principle 1 and embodies our commitment to protecting the personal information we hold.

It covers how we collect and handle personal information, including *sensitive information*.

'Sensitive information' is a subset of personal information and includes information about your health, genetics, biometrics or disability; racial or ethnic origin; religious, political or philosophical beliefs; professional association or trade union memberships, sexuality; or criminal record.² Special requirements apply to the collection and handling of sensitive information.

This privacy policy is not intended to cover our handling of commercially sensitive information or other information that is not defined in the Privacy Act as personal information.

2 Our Personal Information Handling Practices

2.1 Collection of personal information

Personal information may be collected directly by us, or by people or organisations acting on our behalf (e.g. contracted service providers). It may be collected directly from you, or on your behalf from a representative you have authorised.

We may also obtain personal information collected by other Australian Government agencies, state or territory governments, other third parties, or from publicly available sources. This will only occur

¹ See section 6 of the *Privacy Act 1988* and the APP Guidelines issued by the Office of the Australian Information Commissioner.

² As above.



where you consent, where it is unreasonable or impractical to collect the information only from you or where we are required or authorised to do so by law.

Under the APPs, we will only collect information for a lawful purpose that is reasonably necessary or directly related to one or more of our functions and activities, or where otherwise required or authorised by law.

When we collect personal information, we are required under the APPs to notify you of a number of matters. These include the purposes for which we collect the information, whether the collection is required or authorised by law, and any person or body to whom we usually disclose the information, including if those persons or bodies are located overseas. We usually provide this notification by including privacy notices on our paper based forms and online portals.

2.2 Types of personal information collected by us

We collect and hold a broad range of personal information in records relating to:

- employment and personnel matters for our staff and contractors (including security assessments);
- individuals participating in our funded programs and initiatives;
- the management of contracts and funding agreements;
- the management of fraud and compliance investigations;
- the management of audits (both internal and external);
- complaints (including privacy complaints) made and feedback provided to us;
- requests made to us under the [Freedom of Information Act 1982](#) (Cth); and
- the provision of legal advice by internal and external lawyers.

This personal information may include but is not limited to:

- your name, address and contact details (e.g. phone, email and fax);
- photographs, video recordings and audio recordings of you;
- information about your personal circumstances (e.g. marital status, age, sex, gender, occupation, accommodation and relevant information about your partner or children);
- information about your financial affairs (e.g. payment details, bank account details and information about business and financial interests);
- information about your identity (e.g. date of birth, country of birth, passport details, visa details, drivers licence);
- information about your employment (e.g. work history, referee comments, remuneration);
- information about your background (e.g. educational qualifications, the languages you speak and your English proficiency);



2.3 Collection of sensitive information

In carrying out our functions and activities we may collect personal information that is *sensitive information* (see section 1.4). The APPs impose additional obligations on us when collecting, using or disclosing sensitive information. We may only collect sensitive information from you:

- where you provide your consent; or
- where required or authorised by law; or
- where a permitted general situation exists such as to prevent a serious threat to safety.³

We also collect sensitive information where authorised to do so for the purposes of human resource management, fraud or other investigations, taking appropriate action against suspected unlawful activity or serious misconduct, and responding to inquiries by courts, tribunals and other external review bodies.

2.4 Collecting personal information from children and young people

In carrying out our functions and activities we may collect personal information about children and young people, either directly from them, through their parents or guardians, or from their education or child care providers. Where children and young people are over the age of 16, our general policy is to collect information directly from them as they are likely to have the capacity to understand any privacy notices provided to them and to give informed consent to collection. For children under the age of 16, or where capacity to provide consent is at issue, our policy is that a parent or guardian will be notified and their consent sought.

2.5 Collection of unsolicited information

Sometimes personal information is not sought by us but is delivered or sent to us by either the individual or a third party without prior request.

Where unsolicited information is received by us, we will, within a reasonable period, determine whether that information is directly related to one or more of our functions or activities. If this cannot be determined, we may, as soon as practicable and in accordance with the [Archives Act 1983](#) (Archives Act) and the Privacy Act, destroy or de-identify the information. If this can be determined we will notify you of the purpose of collection and our intended uses and disclosures according to the requirements of the APPs, unless it is impracticable or unreasonable for us to do so.

³ For further information on the range of 'permitted general situations' see APP Guidelines – Chapter C



2.6 How we collect personal information

We primarily use forms, online portals and other electronic or paper correspondence to collect your personal information. By signing paper documents or agreeing to the terms and conditions and disclaimers for electronic documents you are consenting to the collection of any personal information you provide to us.

We may also collect your personal information if you:

- communicate with us by telephone, mail, email, fax or SMS;
- attend a face to face meeting or event conducted by us or our contractors;
- use our website;
- interact with us on our social media platforms.

For further information on what information we collect online see section 2.12 of this privacy policy.

As noted at section 2.1, in certain circumstances we may collect and receive personal information about you from third parties including other Australian Government agencies and state and territory governments.

2.7 Remaining anonymous or using a pseudonym

We understand that anonymity is an important element of privacy and you may wish to remain anonymous, or use a pseudonym when interacting with us.

In many cases you will be able to advise us that you wish to remain anonymous or use a pseudonym during your contact with us. However, in circumstances where it is likely we would need to collect your personal information, such as to resolve a dispute or provide you with a service, we will notify you accordingly at the time of collection.

2.8 Information collected by our contractors

Under the Privacy Act, we are required to take contractual measures to ensure that contracted service providers (including subcontractors) comply with the same privacy requirements applicable to us.

2.9 Storage and data security

2.9.1 Storage

We hold personal information in a range of paper-based and electronic records, including cloud computing.

Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the Australian Government's records management regime, including



the Archives Act, records authorities, general disposal authorities and other whole of government policies or standards issued by the National Archives of Australia.

2.9.2 Data security

We take all reasonable steps to protect the personal information held in our possession against loss, unauthorised access, use, modification, disclosure or misuse.

Access to your personal information held by us is restricted to authorised persons who are departmental employees or contractors, on a need to know basis.

Electronic and paper records containing personal information are protected in accordance with Australian Government security policies, including the Attorney-General's Department's [Protective Security Policy Framework](#) and the Australian Signals Directorate's [Information Security Manual](#).

We conduct regular audits to ensure we adhere to these policies.

2.10 Data quality

We take all reasonable steps to ensure that the personal information we collect is accurate, up-to-date, complete, relevant and not misleading.

These steps include responding to requests to correct personal information when it is reasonable and appropriate to do so. For further information on correcting personal information see section 3 of this privacy policy.

Audits and quality inspections are also conducted from time to time to ensure the accuracy and integrity of information, and any systemic data quality issues are identified and resolved promptly.

2.11 Purposes for which information is collected, held, used and disclosed

We collect, hold, use and disclose personal information for a variety of different purposes including:

- performing our management, employment and personnel functions in relation to our staff and contractors;
- performing our legislative and administrative functions;
- policy development, research and evaluation;
- data sharing or data integration with other Australian Government agencies, including but not limited to, data sharing or data integration with the Australian Bureau of Statistics for the Multi-Agency Data Integration Project and the Data Integration Partnership for Australia;
- complaints handling;
- administering requests received by us under the *Freedom of Information Act 1982* (Cth);
- preventing, detecting, investigating or dealing with fraud or corruption against the Commonwealth;
- program management;



- maintaining effective working relationships with state and territory governments, non-government education authorities and providers, universities and other relevant stakeholders;
- policy advice and support to our Ministers;
- contract management; and
- management of correspondence with the public.

We use and disclose personal information for the primary purposes for which it is collected. You will be given information about the primary purpose of collection at the time the information is collected.

We will only use your personal information for secondary purposes where we are able to do so in accordance with the Privacy Act. This may include where you have consented to this secondary purpose, or where the secondary purpose is related (or if sensitive information, directly related) to the primary purpose and you would reasonably expect us to use or disclose the information for the secondary purpose, where it is required or authorised by law or where a permitted general situation exists such as to prevent a serious threat to safety.

Likely secondary purposes for which we may use or disclose your personal information include but are not limited to: quality assurance, auditing, reporting, research, evaluation and analysis, data sharing, data integration and promotional purposes.

2.12 Our website

2.12.1 Log information (browsing)

When you use our online services, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your server address, your top level domain name (for example, .com, .gov, .au, .uk, etc.), the date and time of visit to the site, the pages accessed and documents viewed, the previous sites visited, the browser type, the browser language, and one or more cookies that may uniquely identify your browser.

No attempt is made to identify you through your browsing other than in exceptional circumstances, such as an investigation into the improper use of the website.

2.12.2 Cookies

Cookies are used to maintain contact with a user through a website session. A cookie is a small file stored by your web browser software on your computer when you access our website. Cookies allow us to recognise an individual web user as they browse our website.

We use cookies to 'remember' your browser between page visits. In this situation, the cookie identifies your browser, not you personally. No personal information is stored within our cookies. You may disable cookies by adjusting the settings on your web browser, but if you do this you may not be able to use the full functionality of our website.



2.12.3 Collection and Analytics

We collect your information, including personal information, by a variety of software applications and services. These applications and services, including Google Analytics, use first-party cookies and JavaScript code to help analyse how users use the site.

The information collected includes when you accessed our website, how you accessed the site (for example, from a search engine, a link, an advertisement) and what you did on the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of compiling reports on website activity and providing other services relating to website activity and internet usage.

Demographic and interest reports may be generated including identifiers such as your age, gender, affinity categories (for example, education and training interests), in-market segments and other categories based on acquisition, behaviour, and conversions metrics. These reports may be used by the department to assist it make policy and program decisions.

You can prevent your information from being collected on our website by:

- disabling/ refusing the use of cookies;
- disabling JavaScript Opt-out Browser Add-on; and
- disabling location services on your browser/device.

Additional advice regarding how to protect yourself online can be found at [Stay Smart Online](#).

2.12.4 Links to External Websites and Social Networking Services

Our website includes links to other websites. We are not responsible for the content and privacy practices of other websites. We recommend that you examine each website's privacy policy separately.

We also use social networking services such as Facebook, Twitter, Google+, Youtube, Instagram and Yammer to talk with the public and our staff. When you talk with us using these services we may collect your personal information to communicate with you and the public.

The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for these services on their websites.

2.12.5 Electronic communication

There are inherent risks associated with the transmission of information over the internet, including via email. You should be aware of this when sending personal information to us via email or via our website or social media platforms. If this is of concern to you then you may use other methods of communication with us, such as post, fax or telephone (although these also have risks associated with them).

We only record your email address when you send a message to us or subscribe to one of our mailing lists. Unless otherwise notified, any personal information, including email addresses, will only be used or disclosed for the purpose for which it was provided.



2.13 Disclosure of personal information to other Commonwealth agencies providing services to the department

We may disclose your personal information to the Department of Jobs and Small Business and/or the Service Delivery Office within the Department of Finance. These agencies provide a range of corporate services to the department. For more information about the Service Delivery Office please refer to: www.sdo.gov.au.

2.14 Disclosure of personal information overseas

We will, on occasion, disclose personal information to overseas recipients. The situations in which we may disclose personal information overseas include:

- the publication on the internet of material which may contain personal information, such as departmental reports and other documents; photographs, video recordings and audio recordings; and posts and comments on our social media platforms;
- the provision of personal information to overseas researchers or consultants (where consent has been given for this or we are otherwise legally able to provide this information);
- the provision of personal information to recipients using a web-based service where data is stored on an overseas server, for example, the department may use Mailchimp for email subscriptions and SurveyMonkey for online surveys (see below for further detail on these services); and
- the provision of personal information to foreign governments and law enforcement agencies (in limited circumstances and where authorised by law).

We will not disclose your personal information to an overseas recipient unless one of the following applies:

- the recipient is subject to a law or binding scheme substantially similar to the Australian Privacy Principles, including mechanisms for enforcement;
- you consent to the disclosure after being expressly informed that we will not be taking reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles;
- disclosure is required or authorised by law;
- the disclosure is reasonably necessary for an enforcement related activity conducted by, or on behalf of, an enforcement body and the recipient performs similar functions.

It is not practicable to list every country to which we may provide personal information as this will vary depending on the circumstances.

However, you may contact us (see 5.1 of this privacy policy) to find out which countries, if any, your information has been given to.

2.15 Unauthorised access, use or disclosure of personal information

We will take seriously and deal promptly with any unauthorised access, use or disclosure of personal information.



The Notifiable Data Breaches (NDB) scheme which commenced on 22 February 2018, generally requires agencies and organisations to notify individuals whose personal information is involved in a data breach which is likely to result in serious harm to those individuals. These entities are also required to notify the Office of the Australian Information Commissioner. We comply with the NDB scheme when dealing with these types of data breaches.

The department also has regard to relevant guidance material issued by the Office of the Australian Information Commissioner, including the '[Data breach preparation and response — A guide to managing data breaches in accordance with the Privacy Act 1988 \(Cth\)](#)', when responding to any incidents involving the unauthorised access of, use or disclosure of personal information.

3 Accessing and Correcting Your Personal Information

3.1 How to seek access to and correction of personal information

You have a right under the Privacy Act to access personal information we hold about you.

You also have a right under the Privacy Act to request corrections of any personal information that we hold about you if you think the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

To access or seek correction of personal information we hold about you, please contact us using the contact details set out at section 5.1 of this privacy policy.

3.2 Our access and correction process

If you request access to or correction of your personal information, we must respond to you within 30 calendar days.

While the Privacy Act requires that we give you access to or correct your personal information on request, it does set out circumstances in which we may refuse you access or decline to correct your personal information.

If we refuse to give you access or decline to correct your personal information we will provide you with a written notice which, among other things, gives our reasons for refusing your request.

It is also possible to access and correct documents held by us under the [Freedom of Information Act 1982](#).

For further information on requesting access to or correction of your personal information please read our [Guide to Accessing and Correcting Personal Information](#) document.

3.3 If you are unsatisfied with our response

If you are unsatisfied with our response, you may make a complaint, either directly to us (see section 5.1 below), or you may wish to contact:

- the Office of the Australian Information Commissioner at enquiries@oaic.gov.au or telephone 1300 363 992; or



- the Commonwealth Ombudsman by lodging a '[Complaint Form](#)' online or telephone 1300 362 072.

4 Privacy Impact Assessments

4.1 What is a Privacy Impact Assessment

A privacy impact assessment (PIA) is a systematic assessment of a project that identifies the impact that the project might have on the privacy of individuals, and sets out recommendations for managing, minimising or eliminating that impact.

4.2 When we conduct Privacy Impact Assessments

The [Privacy \(Australian Government Agencies — Governance\) APP Code 2017](#) (Privacy Code) requires us to undertake a PIA in certain instances and to maintain a register of those PIAs from 1 July 2018. In accordance with the Privacy Code, we publish a version of our [PIA register](#) on our website.

5 Complaints

5.1 How to make a complaint

If you think we may have breached your privacy you may contact us to make a complaint using the contact details set out at section 5.1 of this privacy policy. In order to ensure that we fully understand the nature of your complaint and the outcome you are seeking, we prefer that you make your complaint in writing.

Please be aware that it may be difficult to properly investigate or respond to your complaint if you provide insufficient detail. You may submit an anonymous complaint, however if you do it may not be possible for us to provide a response to you.

5.2 Our complaint handling process

We are committed to quick and fair resolution of complaints and will ensure your complaint is taken seriously and investigated appropriately. You will not be victimised or suffer negative treatment if you make a complaint.

For further information about our complaint handling process please read our Privacy Complaint Handling Procedures document on our website.

5.3 If you are unsatisfied with our response

If you are not satisfied with the way we have handled your complaint in the first instance, you may contact the Office of Corinda State High School to refer your complaint for further investigation.

Corinda State High School
Telephone: 33790222
Email: alumni@corindashs.eq.edu.au
Post: PO Box 1453, Corinda QLD 4075



6 Contact Us

6.1 General enquiries, complaints, requests for access or correction

If you wish to:

- query how your personal information is collected, held, used or disclosed by us;
- ask us questions about this privacy policy;
- request access to or seek correction of your personal information; or
- make a privacy complaint;

please contact us:

By mail:

Corinda Alumni Association
Corinda State High School
46 Pratten Street
Corinda QLD
4075

By email:

alumni@corindashs.eq.edu.au

By telephone:

33790222 (please note this is our main number)

6.2 Availability of this privacy policy

If you wish to access this privacy policy in an alternative format (e.g. hard copy) please contact us using the contact details set out at section 5.1 above. This privacy policy will be made available free of charge.

7 Privacy Policy Updates

This privacy policy will be reviewed at least annually and updated as required.

Date policy last updated: June 20