

Psychwire

Privacy Policy

RECITALS

This Privacy Policy sets out our policy with respect to the way We collect, use and disclose Personal Information about You, which is disclosed to Us either directly or through the Website.

1. Definitions and Interpretation

1.1. In this Privacy Policy (including the recitals) unless the context otherwise requires:

“**Course**” means the online training courses available on the Website;

“**Controller**” has the meaning as listed in the General Data Protection Regulation and for the purposes of this Privacy Policy will mean Psychwire Australia Pty Ltd ACN 149 920 785;

“**PCO’s Email Address**” means bindia@psychwire.com;

“**Personal Information**” means information or an opinion from which Your identity is apparent or can be reasonably ascertained and includes such information as listed in clause 3.1 and Sensitive Information;

“**Privacy Contact Officer**” or “**PCO**” means the point of contact for advice on privacy matters related to the Website;

“**Privacy Policy**” means this privacy policy (including the recitals and the schedule), as amended or supplemented from time to time;

“**Processor**” has the meaning as listed in the General Data Protection Regulation;

“**Sensitive Information**” means such information as listed in clause 3.2;

“**Website Owner**”, “**We**”, “**Our**” or “**Us**” means the entity named as the Website Owner in the Schedule;

“**Website**” means www.psychwire.org.au;

“**You**”, “**Your**” means you as the user of the Website.

2. Collection of Personal Information

2.1. We, as Controller, collect Personal Information about You:

- (a) because You have provided it to us, for example, if You interact with Us on the Website in any manner;
- (b) because We need it to provide a product or service that You have requested, for example, if You create a user account on the Website, subscribe to an email list, purchase products or services or participate in a Course on the Website;
- (c) because You work for Us or apply to Us for a job; and
- (d) for purposes related to any of the above.

2.2. By providing us with Personal Information, You consent to the practices described in this Privacy Policy. When providing Personal Information to Us, please be aware that there are risks involved in transmitting such information across the Internet.

2.3. We may use third-party software provider on our Website to collect your Personal Information and such third-parties have instructions that such Personal Information may only be used by Us.

1. Types of Personal Information

Personal Information

2.4. Personal Information that We may collect from You includes Your:

- (a) name;
- (b) date of birth;
- (c) gender;

- (d) residential and/or postal address;
- (e) telephone number;
- (f) email address;
- (g) student identification number;
- (h) employment details;
- (i) educational qualifications;
- (j) educational enrolment details;
- (k) banking and payment details;
- (l) interaction and click history on our Website; and
- (m) any other information you provide to us on the Website or by interacting with Us.

Sensitive Information

- 2.5. Depending on Your use of the Website, including where you register or participate in a Course, We may collect Personal Information that may be considered as sensitive information under the *Privacy Act 1988* (Cth). The types of Sensitive Information that We may collect from You include Your membership of a professional or trade association.

3. Use and Disclosure of Personal Information

- 3.1. We use Your Personal Information in the following ways:
- (a) to deliver services You have requested from us, including the provision of goods and/or services through the Website;
 - (b) to confirm Your identity;
 - (c) for remarketing purposes and
 - (d) for direct marketing purposes.

Use of Personal Information

- 3.2. We will only use Your Personal Information for the purposes for which it was collected and We will not disclose Your Personal Information without gaining Your consent except where such disclosure is required by law.
- 3.3. You acknowledge and agree that the collection of your Personal Information is necessary for Us to fulfil the purposes listed in 4.1 and the failure to provide such data may render Us unable to continue transacting or dealing with You.
- 3.4. We may share your Personal Information with Our associates, business partners or marketing agents for use in relation to the purposes listed in 4.1.
- 3.5. We or a Processor may analyse your Personal Information to create a profile of your interest and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources if available. We may also use your Personal Information to detect and cut fraud and credit risk.
- 3.6. You may lodge an objection to the processing of your Personal data “on grounds relating to your particular situation”. We may deny your objection if there is legitimate grounds for the processing or if required by law.

Marketing

- 3.7. For direct marketing purposes, Your Personal Information will be added to Our database. The database may be used for ongoing marketing and educative purposes. The type of marketing and educative activities that We undertake includes forwarding material to You so that You are kept updated in relation to various issues and Our services. If at any time You do not wish to continue receiving this information, We provide an “opt-out” procedure in each communication to You.

- 3.8. For remarketing purposes, Your Personal Information will be shared with our business partners or marketing agents for ongoing marketing purposes. If at any time You do not wish to continue receiving this information, You may contact the PCO at the PCO's Email Address to revoke your consent.

Third party disclosure

- 3.9. By disclosing Your Personal Information to us, You consent to Your Personal Information being disclosed to our overseas service providers (if applicable), which may not meet the standard set by the *Privacy Act 1988* (Cth) or the General Data Regulation Provisions.

Period of holding of your data

- 3.10. We will hold your data for a period of at least 7 years and may review and request update of data from time to time. You may opt out or request that your data be deleted by following the process set out in this Privacy Policy.

4. Opting Out and Data deletion

- 4.1. In each generic correspondence sent out to You, We will endeavour to include simple instructions on how You can immediately unsubscribe from the relevant mailing list. You can also opt out from receiving promotional material by contacting us directly.
- 4.2. You may request that all Personal Information we hold about You be completely deleted, on the basis that article 17.1 of the General Data Protection Regulations applies, by providing the request in writing to Our Privacy Contact Officer.

5. Accessing, Updating and Correcting Your Personal Information

- 5.1. You may request from Us in writing to provide You with a copy of the Personal Information We hold about You. We will endeavour to process Your request as soon as practicable but within one month for regular matters or within three months, depending on the complexity of the request. You may request this information be provided in a structured, commonly used and machine-readable format and have the right to transmit the data to another Controller. If We deny Your request, We will provide reasons in writing as to Our decision. To complain or contest Our decision, please contact Our Privacy Contact Officer.
- 5.2. If You wish to amend information that is out of date or incorrect, or if You wish for Your Personal Information to be removed from Our database, please contact Our Privacy Contact Officer.

6. Security

- 6.1. We have secured Our Website using industry standard technology. However, We cannot provide any guarantee with respect to the security of Your Personal Information and We will not be liable for any breach of security or unintended loss or disclosure of information due to the Website being linked to the internet.
- 6.2. We will use all reasonable endeavours to secure any Personal Information We hold about You and to keep this information accurate and up-to-date, including by:
- (a) employing appropriate technical, administrative and physical procedures to protect Personal Information from unauthorised disclosure, loss, misuse or alteration;
 - (b) limiting access to Personal Information to individuals with a business need consistent with the reason the information was provided; and
 - (c) keeping Personal Information only for as long as it is required for business purposes or by the law.

7. Cookies

- 7.1. You may be required to have a cookie-enabled browser to fully access the Website. A cookie is a piece of data stored on Your computer tied to information about You. Cookies may be used to track Your internet browsing activities and the websites You have visited.
- 7.2. We may, for statistical, security, quality or marketing purposes, use cookies to log:
- (a) Your internet protocol (IP) address;
 - (b) the date and time of Your visit;
 - (c) the pages You have accessed and documents downloaded; and
 - (d) the type of browser You were using.

8. Links

- 8.1. The Website may contain links to other websites. Please note that We are not responsible for the privacy practices of these sites. When You leave Our Website, You should familiarise Yourself with the privacy statement of that website prior to providing Your Personal Information, as this Privacy Policy only applies to Personal Information collected by Us or through Our Website.

9. Changes to this Privacy Policy

- 9.1. We may, from time to time, review, amend and update this Privacy Policy. When this occurs, We will post details of this update on the Website. We encourage You to periodically review this Privacy Policy so You are aware of Our latest practices with respect to Personal Information.
- 9.2. Hardcopies of this Privacy Policy are available upon request.

10. Contact Information

- 10.1. If You wish to exercise any of Your rights under this Privacy Policy, have any questions, comments or complaints regarding Our practices, or if You are of the view that We have not adhered to this Privacy Policy, You may write to Our Privacy Contact Officer at the PCO's Email Address.
- 10.2. Upon receipt of a complaint, We will work with You to resolve Your complaint. If We are unable to resolve Your complaint to Your satisfaction within a reasonable timeframe, You may refer Your complaint to the Privacy Commissioner of Australia.