

# Privacy Policy and Procedure



## Purpose

Management Consultancy International Pty Limited ACN 103 488 482 (RTO Code 91088) (**MCI, we, us** and **our**) is committed to protecting your personal information in accordance with the Privacy Act 1988 (Cth) and other applicable data protection laws.

Our Privacy Policy and Procedures explain how we collect, hold, use and disclose your personal information in Australia or overseas.

## Scope

Our Privacy Policy and Procedures apply only to us. They do not apply to any other company or organisation we may associate with; including organisations whose services are in some way linked to us via online content or services (such as apps, hyperlinks, online advertisements and social media platforms).

Our current students, prospective students, clients, partners and visitors should read this document and should ensure they are aware of any changes we make to our Privacy Policy and Procedures.

## References

Among other things, our Privacy Policy and Procedures take in account:


- the Australian Privacy Principles set out in Schedule 1 of the *Privacy Act 1988* (Cth);
- Higher Education Support (VET) Guideline 2015
- the NSW Government's Smart and Skilled Consumer Protection Strategy;
- the Privacy (Tax File Number) Rule 2015;
- the *Privacy Act 1988* (Cth);
- ISO 9001: 2008
- the Standards for Registered Training Organisations (RTOs) 2015; and
- the *Student Identifiers Act 2014* (Cth).

The following forms, including but not limited to, are specifically subject to our Privacy Policy and Procedures:

- student enrolment forms;
- privacy acknowledgement forms;
- privacy enquiry forms; and
- third party information release consent forms.

## Responsibilities

The responsibility for implementing the requirements of our Privacy Policy and Procedures rests with our Administrative staff and our IT staff.



The responsibility for overseeing our Privacy Policy and Procedures rests with our General Manager, Quality & Business Improvement.

## Policy and Procedures

### 1. The kind of personal information we collect and hold

Depending on the particular circumstances, we may collect, hold and disclose a range of personal information and other information about you. This can include:

- a. your name, date of birth, gender, contact details (including postal address, email address, phone number and/or mobile telephone number), employment details, educational history and reasons for study; and/or
- b. your racial or ethnic origin and health information.

This is not an exhaustive list. For example, in certain cases, we may also request your Tax File Number (**TFN**) or your Unique Student Identifier (**USI**).

#### 1.1 TFN

We will only collect, hold, use and disclose your TFN in accordance with the *Privacy Act 1988* (Cth) and Privacy (Tax File Number) Rule 2015. Without limiting our obligations under those laws, we will take reasonable steps to ensure that you are informed of the taxation law or personal assistance law which authorises us to request or collect your TFN;

- the purpose(s) for which your TFN is requested and collected; and
- the consequences of declining to quote your TFN.

More information concerning the purpose of collecting your TFN can be found in our VET Fee Help Booklet.

#### 1.2 USI

We need to collect your USI to issue a VET qualification or VET statement of attainment to you. If we collect, use or disclose your USI, we will comply with the *Privacy Act 1988* (Cth) and the *Student Identifiers Act 2014* (Cth). For clarity, we will not use your USI as our own identifier in our systems and databases.

Further information concerning the purpose of collecting your USI can be found at [www.usi.gov.au](http://www.usi.gov.au).

Where necessary, we may seek specific consents to collect your information.

If you provide information about other individuals to us (for example, your emergency contact's details), we rely on you to inform those individuals that you are providing their personal information to us and to advise them about our Privacy Policy and Procedures.



## 2. How we collect personal information

We may collect your information in a number of ways, including:

- a. directly from you (such as when: (i) you complete student enrolment forms, VET Fee Help forms or USI permission forms; (ii) you contact us with a question or request; or (iii) you use our online chat service. You may also provide information to us when you register for, or attend, public events such as trade shows or seminars);
- b. from third parties you have authorised to disclose your information (such as employment agencies, Analysts (Information Technology), Job Services Australia or your employers);
- c. from publicly available sources of information;
- d. when we are legally authorised or required to do so; or
- e. through digital communications, when you visit our websites or use social media platforms such as Youtube, Facebook, LinkedIn and Twitter (in this respect, please see Sections 4 and 5 below).

You have a right not provide information to us. In addition, where practicable and lawful, we will allow you to interact with us anonymously or by using a pseudonym. However, for most of our functions and activities, we need your name and sufficient information to enable us to respond to your application, complaint, enquiry or request.

### 2.1 Children


We will not knowingly collect information directly from children under the age of 16, without verifiable parental consent. If you are under the age of 16, please do not provide us with any information about you. If you have reasons to believe that we may have accidentally received information from a child under the age of 16, please contact us immediately, using the contact details set out in Section 3 below.

## 3. How we hold personal information

We are committed to protecting the information you provide us.

How we hold your information will vary according to the circumstances. For example, we may store your information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or in storage facilities that are owned and operated by our service providers.

We use a combination of technical solutions, security controls (including username restrictions and passwords), managerial processes and other reasonable steps (such as data back-up and offsite/cloud storage services) to help us safeguard your information from loss, fire, flood, interference, unauthorised access, use, modification or disclosure and against other misuse.



For clarity, as required by law, some information we collect and hold, such as your health information, is sensitive and therefore subject to greater protection than other 'non-sensitive' information.

We will not sell, rent or lease your information to third parties.

#### 4. How we use personal information

Our business is to provide you with training services, as well as related services and product. In order to do so effectively, we may use your information for a range of different purposes, including:

- a. for our operations and for purposes that are related to one or more of our functions or activities;
- b. to facilitate course and seminar enrolments;
- c. to verify your identity and to allow you to access our online systems;
- d. to communicate with you;
- e. to assess your entitlement to Commonwealth assistance;
- f. to confirm that a USI is your USI;
- g. to provide you with the information, products and/or services that you request;
- h. to personalise your experiences on our websites;
- i. to provide support and product updates;
- j. to gain an understanding of your needs so that we may improve or develop our products and services;
- k. to perform research and analysis; and
- l. subject to your consent, other purposes which will be notified to you from time to time.


##### 4.1 Direct Marketing

We may also use your information so that we and our business partners can promote and market products and/or services that we think may be of interest to you (including products and/or services provided by a third party). This marketing may be carried out in a variety of ways (including by email or by customising on-line content) and may continue after you cease acquiring products and/or services from us, until you opt-out. You may opt-out by emailing us at [info@mci.edu.au](mailto:info@mci.edu.au) by following the “unsubscribe” instructions in any email communication you receive from us.

#### 5. How we disclose personal information

Common situations in which we disclose your information include:

- a. releasing your information to Australian Government Departments, State Government agencies and designated bodies who are authorised to require it and collect it;

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- b. reporting to the Australian Taxation Office about Commonwealth supported fee liabilities;
  - c. sharing your information with other training providers;
  - d. disclosing your information to third parties who provide services to us, such as administrative tasks, student and product support, data consolidation, data storage and information management;
  - e. where we are legally authorised or required to do so (including disclosing information to law enforcement and national security agencies); or
  - f. if we believe the disclosure is necessary to prevent a serious threat to your life or health.

Subject to applicable laws, we do not disclose your information to your family members or friends without your prior consent.

Where your information is disclosed to a third party, we take reasonable steps to ensure your information is not used or disclosed for a purpose other than the purpose for which the information was given. We require all of our service providers to preserve the confidentiality and security of the information they receive from us.

### **5.1 Overseas disclosure of personal information**

In some cases, we may disclose your information to organisations, such as our providers of cloud services and website hosting services, who may be based outside of Australia. For example, we may disclose your information to our service providers in the Philippines and the United States of America.

## **6. How long do we keep personal information**

We may need to keep your information for a significant time. For example, we will keep:


- student records, certificates and statements of attainment, in electronic format, for 30 years;
- assessment records for at least 6 months.

Subject to applicable laws and our internal policies, we normally destroy or de-identify your information when we no longer need it.

## **7. How to access, update or correct personal information**

If you wish to access any of your information that we hold or you would like to correct any errors in that information, you may:

- contact us, using the contact details set out in Section 5.9 below; or
- use our Privacy Enquiry Form which you may access at this [link](#).



The Australian Privacy Principles set out a number of rules in respect of accessing, updating and correcting your information. For example, we may refuse to give you access to your information if giving access would have an unreasonable impact on the privacy of other individuals, or if your request for access is frivolous or vexatious. If we refuse to give you access to, update, or correct, your personal information, we will provide you with a written explanation including the reasons for our refusal. We may charge you an administrative fee for providing access to your information in response to a request.

## 8. How to make a privacy complaint

If you wish to notify us of any privacy complaint you may have against us, including if you think that we have failed to comply with the Australian Privacy Principles, you may:

- contact us, using the contact details set out in Section 5.9 below; or
- use our Privacy Enquiry Form which you may access at this [link](#).

We are committed to acknowledging your complaint in a prompt manner and will give you an estimated timeframe for when we will respond to your complaint.

It is our intention to resolve your complaint to your satisfaction. However, if you are not satisfied with our response, you are entitled to contact the Office of the Australian Information Commissioner (OAIC), on 1300 363 992 or the other contact details on the OAIC's website ([www.oaic.gov.au](http://www.oaic.gov.au)), who may investigate your complaint further.

## 9. MCI Contact Details

If you have a question, request or complaint concerning the handling of your personal information by us, you may contact us by using the following details:


The Privacy Officer/ Quality and Compliance Officer  
Management Consultancy International Pty Limited  
Level 4, 23 Hunter Street  
SYDNEY NSW 2000  
Phone: 1300 768 550  
Fax: +61 2 9230 0940

Online enquiry form: Click [here](#).

## 10. Websites

When you visit or browse our websites, our servers make a record of your visit and log information including:

- a. your IP address;
- b. the date, time and duration of your visit;

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- c. the number of visits you made and the number of pages you viewed during your visits; and
  - d. the path you took to access the relevant website.

We only use this information for reporting and statistical purposes. We do not attempt to identify you.

Please note that we also:

- a. use various internet technologies (including web beacons) for data analysis and personalisation services; and
- b. place advertisements on other websites that may use cookies. Cookies are small files that may be placed on your computer or mobile device by a web service. You may normally choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser.

The information provided by web analytics and cookies may personally identify you. By using our websites, you will consent to the collection of your information for that purpose.

## 11. Social Media

We sometimes use social media platforms such as Youtube, Facebook, LinkedIn and Twitter to communicate with the public about our activities, products and/or services. Any information provided through the use of social media is likely to be publicly available. Social media services may also collect your information and use it for their own purposes. Those services have their own privacy policies. Our Privacy Policy and Procedures do not apply to the acts or practices of social media services.

## 12. Changes

We may amend our Privacy Policy and Procedures from time to time:

- to comply with amendments made to applicable laws;
- to reflect the integration of new technologies into our systems; or
- to accommodate changes to our internal practices and procedures.

All information that we hold about you will be held in accordance with our most recent Privacy Policy and Procedures.





## Records

The following records shall be generated and retained in the Student Management System for a period of 5 years:

- Completed privacy enquiry forms with any supporting documentation
- Records of any responses to the enquiries

## Key links

Forms and/or documents required for this procedure:

Privacy enquiry form: Click [here](#).

Document revision history and version control

Version	Summary of changes	Author	Approved by	Effective date
3.0	Policy and Procedure reviewed against relevant legislation and re-written to include requirements of the legislation and regulations listed in the Reference section of this Policy & Procedure	Quality & Compliance Officer	COO	09/06/2016