

Privacy Policy

About this Privacy Policy

Kaplan Australia Pty Limited, its subsidiaries and affiliates (collectively referred to as “Kaplan”) appreciate that privacy is important to you. Kaplan is committed to handling personal information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth).

This Privacy Policy applies to the collection, use and disclosure of personal information by Kaplan and its schools and educational institutions including **Kaplan Business School, Kaplan Professional, Kaplan International English, Murdoch Institute of Technology and the University of Adelaide College.**

In this policy “we” and “us” refers to Kaplan and “you” refers to any person about whom we collect personal information.

What information does Kaplan collect about you?

Students and clients

When you enrol in a course or program of study Kaplan will collect personal information about you, such as your name, address, contact details (including your phone number and email address), date of birth, citizenship, educational history and results, work history (if relevant), emergency contact details, details of your parent(s) or guardian(s) (for students who are under 18 years of age at the time of enrolment), and credit card details. We may also collect personal information which is necessary for particular products or services you request from us (for example, when you register for testing or training with Kaplan). We will collect personal information during the course of dealing with you, for example, as you progress through a course or program of study.

We may collect other personal information about you which is considered sensitive information (for example, information about whether you identify as Aboriginal or Torres Strait Islander; information which may disclose your racial or ethnic origin (such as your proficiency in languages other than English); information about your health or a

disability where this is relevant to accommodating your needs; and information that may disclose your membership of a professional or industry association (such as when assessing your eligibility for course credit or exemption)).

We may collect government related identifiers, such as your tax file number, passport number (if relevant), Confirmation of Enrolment (COE) number (or equivalent), student concession number, and Commonwealth Higher Education Student Services Number (CHESSN) (or equivalent), which are necessary to verify your identity, to confirm your eligibility for enrolment, or to assess or administer your entitlement to financial assistance.

Collection of your personal information may be required by law for the purpose of reporting to Commonwealth, State and Territory government agencies for planning, evaluative, administrative and funding purposes. Collection of your personal information may also be required to assess your entitlement to, and administer any entitlement to, financial assistance under Commonwealth programs for supporting students such as FEE-HELP and VET FEE-HELP (where applicable). Personal information which may be required by law to be collected includes your tax file number, visa details and passport number (if relevant). Further information about these purposes will be provided to you at the time of collection.

We generally collect personal information directly from you. We may also collect personal information about you from third parties, for example:

- from schools and other educational institutions where necessary to verify qualifications and course credits for enrolment and assessment purposes;
- from organisations where you may be completing a work placement, internship or practical component of your course or program of study;
- from your employer if your course or program of study is being supported by them or incorporated into your employment;

- from education agents;
- from other educational institutions and organisations that work with us recruiting potential students into our courses and programs of study;
- from other educational institutions and organisations that work in affiliation or partnership with us to provide, promote, accredit or recognise your course or program of study;
- from professional associations of which you are a member or seeking membership; or
- where we are retained by third parties to assist them with auditing and compliance programs (such as auditing and compliance programs conducted for financial planners).

We also collect personal information about you from third-parties for the purpose of direct marketing of our services. The use of your personal information for direct marketing purposes is discussed below.

Where it is lawful to do so, we may monitor and record your communications with us (including email and telephone) for security and dispute resolution purposes.

Employees, contractors and staff Kaplan will collect certain personal information about you, such as your name, address, educational history, work history and contact details (including your phone number and email address) when you make an enquiry about, or apply for, a position with Kaplan. We will collect personal information about you from third parties, such as your referees, as part of our assessment of your suitability for a position. In providing contact details for your referees, you are considered to have given your consent to our collecting personal information from your referees.

Kaplan will collect certain additional personal information about you, such as your date of birth, tax file number, emergency contact details, ABN (if relevant), bank account and superannuation information, and visa, passport and licence details (if relevant), and details relating to your working with children and police checks, if you are offered a position at Kaplan.

During the course of your employment or engagement at Kaplan, we may collect other personal information about you, including records of your work performance, medical certificates, nationality, membership of a professional or industry association (if applicable), trade union membership (if applicable), information concerning your overseas health cover (if relevant) and information concerning any disputes relating to your employment or engagement.

This Privacy Policy does not apply to employee records held by Kaplan relating to an employee or former employee of Kaplan.

Other individuals

Kaplan may collect personal information about individuals who are not students or clients of Kaplan and its schools. This includes, for example, individuals who are enquiring about products or services offered by Kaplan or are dealing with Kaplan on a commercial basis (such as a supplier, contractor or education agent). Kaplan will collect personal information about you including your name, position, address, contact details (including your phone number and email address), licence or registration numbers (if relevant), ABN, bank details and other information relevant to the capacity in which you are dealing with Kaplan.

Visitors to our website

People can generally visit Kaplan websites without revealing who they are or providing any personal information. Kaplan will not collect any personal information about visitors to Kaplan websites, except when such visitors take steps to provide personal information to us (for example, by logging in to the website or when submitting an enquiry with your contact details). Information provided through Kaplan websites will be collected, held, used and disclosed in accordance with this Privacy Policy.

If you provide us with personal information through Kaplan websites, we may log your usage of Kaplan sites to assist us to make Kaplan websites more accessible and valuable to our students and clients.

The Kaplan website uses cookies. A 'cookie' is a small text file stored on your computer which assists in managing customised settings of the website and delivering content. The Kaplan website uses first party and third party cookies together to serve advertisements based on your visits to the website and third party websites. Kaplan uses third party services (including Google Analytics) to undertake demographic analysis of visitors to our website and to display advertisements on third-party websites. You can use the settings in your browser to control how your browser deals with cookies. You can control the settings and/or opt out of display advertisements using Google's Ad Settings (<https://www.google.com.au/settings/ads>).

The internet is not always a secure method of transmitting information. Whilst Kaplan takes reasonable steps to ensure that information it receives is maintained securely, it cannot ensure that communications conducted via the internet will be secure.

Can you deal with Kaplan anonymously?

You have the option of not identifying yourself, or using a pseudonym, when dealing with Kaplan (for example, when making an enquiry). However, it is generally not practicable or lawful for Kaplan to deal with you anonymously or pseudonymously on an ongoing basis (for example, if you wish to enrol in and complete a course or program of study). If we do not collect personal information about you, we may be unable to provide you with the services you have asked us to provide.

How does Kaplan hold personal information about you?

Kaplan holds personal information about you in paper-based and electronic records and systems. Personal information may be collected in paper-based documents and converted to electronic form for storage (with the original paper-based documents either archived or securely destroyed).

Information held in paper-based form is generally securely stored at the school at which you are

enrolled or at the Kaplan head office in Sydney, Australia or in the case of archived records, at an external storage facility in Australia. Kaplan uses physical security and other measures to ensure that personal information is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure.

Information held in electronic form is generally held on servers controlled by Kaplan in Australia. Kaplan uses physical security, password protection and other measures to ensure that personal information stored in electronic form is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure.

Why does Kaplan collect and hold your personal information?

Students and clients

Kaplan collects and holds your personal information for the purpose of providing you with the products, services or information you have requested from Kaplan and to manage and administer the products and services we provide. Your information may be held by Kaplan after you have ceased to be a student or client to satisfy legal or regulatory record-keeping obligations or, for example, to enable Kaplan to confirm or verify your participation in or completion of a course or program.

Other individuals

Kaplan collects personal information about individuals who are not students or clients of Kaplan and its schools for the purpose for which the information was provided (for example, to respond to an enquiry or administer or manage a commercial arrangement between Kaplan and the individual).

How does Kaplan use and disclose my personal information?

Kaplan may use your personal information for the purposes disclosed at the time of collection, or otherwise as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent, unless authorised or required by law.

Generally we will only use or disclose your personal information as follows:

- To provide the products, services or information you have requested from Kaplan, including for the purposes of enrolling you, assessing your progress, tracking your attendance, providing pastoral care (if applicable), issuing your results, and providing certificates of completion and testamurs, for your course(s) and program(s) of study. We may also disclose your information to third parties where they have been retained by Kaplan to assist us with functions such as the recruitment of students, providing student support services (including student satisfaction surveys), the placement of students into internships, work experience or employment, providing overseas student health cover to students (if applicable), promoting or recognising Kaplan qualifications, providing homestay accommodation for students (if applicable), the administration of contracts or undertaking auditing or compliance programs for us.
- To register you for, and administer, events, promotions or competitions.
- To verify to third parties who make enquiries of us as to whether individuals have completed a course or program of study at one of our schools (for example, where a potential employer is verifying a qualification or claimed qualification or you are enrolling in another school or educational institution or your course or program of study is being supported by your employer or undertaken in conjunction with your current employment or where a professional association of which you are a member, or seeking membership, is verifying a qualification or claimed qualification).
- To comply with our legal and regulatory obligations, including disclosure and reporting to Commonwealth, State and Territory government agencies for planning, evaluative, administrative and funding purposes. This includes:
 - o disclosure and reporting to Commonwealth and State government agencies (including State Training Authorities) for the purpose of administering entitlements to financial assistance under Commonwealth and State government programs for supporting students such as FEE-HELP, and VET FEE-HELP (where applicable);
 - o disclosure to government agencies with responsibility for administering and regulating education and training providers in Australia such as the Tertiary Education Quality Standards Agency (TEQSA), the Australian Skills Quality Authority (ASQA) and the Tuition Protection Service (TPS);
 - o disclosure to government agencies or government-appointed providers with responsibility for reviewing and analysing student and other stakeholder feedback, including those administering the Quality Indicators for Teaching and Learning (QILT); and
 - o disclosure to government agencies with responsibility for administering immigration and student visa arrangements (including disclosure of suspected breaches of student visa conditions and statistical information requested in relation to agent immigration performance).
 - o disclosure and reporting to the National Centre for Vocational Education Research Ltd (NCVER), to organisations conducting student surveys and to researchers for the purposes of facilitating statistics and research relating to education (including surveys), for understanding how the VET market operates for policy, workforce planning and consumer information, and for administering VET including program administration, regulation, monitoring and evaluation.

- To assist us to make Kaplan sites, services and products more accessible and valuable to our students and clients.
- To keep your parent(s) and/or guardian(s) informed of your attendance, progress and general well-being, if you are under 18 years of age.
- To perform various administrative or management functions including administering billing and debt recovery; training of staff and contractors and managing their work performance and career progression; quality assurance and evaluation; maintenance and testing of information technology systems; obtaining advice from consultants and professional advisers; and management of legal liabilities and claims (including liaising with legal representatives and insurers).

Will your personal information be used for direct marketing?

Kaplan will use and disclose your personal information for the purpose of direct marketing, including keeping you informed of products and services and new developments we consider may be of interest to you. You may request that you not receive direct marketing communications at any time by contacting the Kaplan Privacy Officer at privacy@kaplan.edu.au or + 61 2 9908 0230.

If we have collected personal information about you from third parties, we will only use that information for direct marketing purposes with your consent (unless an exception applies). If we use your personal information in this way, we will give you the opportunity in each direct marketing communication to request not to receive further direct marketing communications.

Will your personal information be disclosed to overseas recipients?

Kaplan is likely to disclose personal information to overseas recipients.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken

reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

The entities referred to as 'Kaplan' in this Privacy Policy are subsidiaries of Kaplan, Inc. Kaplan, Inc., its subsidiaries and affiliates have operations in North America, the United Kingdom, Europe, Middle East, Africa, China, Hong Kong, North East Asia, South East Asia, Singapore, Australia and New Zealand. In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which Kaplan operates.

Kaplan may disclose personal information to a third party contractor to provide student support and administrative services.

How can you access or seek correction of your personal information?

Generally, if you are a student or client and have a simple enquiry about your personal information (such as confirming your current contact details or confirming results from your course or program) please contact the Kaplan school or educational institution you have enrolled with.

You are entitled to access your personal information held by Kaplan on request. To request access to your personal information, please contact the Kaplan Privacy Officer using the contact details set out below. In limited circumstances, access to your personal information may be declined in accordance with the Australian Privacy Principles. You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

Kaplan endeavours to keep your personal information accurate, up-to-date and complete. You can assist us with this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your details change. However, if you consider any personal

information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

If you wish to have your personal information removed from our records, you may request that your personal information be deleted or destroyed. It will not always be possible to comply with your request to delete or destroy your personal information (for example, records of a course or program of study you have undertaken must be retained by Kaplan for the period(s) that are specified by applicable legislative and regulatory requirements).

We may refuse your request to access, correct or delete your personal information in certain circumstances. If we do refuse your request, we will provide you with a reason for our decision and, in the case of request for correction, we will include a statement with your personal information about the requested correction.

What should you do if you have a complaint about the handling of your personal information?

If you have any questions or concerns about this Privacy Policy or how your personal information has been handled by Kaplan, you may contact your Kaplan school or education institution at any time.

If you have contacted us and your question or concern has not been able to be resolved to your satisfaction, you may make a complaint to the Kaplan Privacy Officer using the contact details set out below.

We will consider and respond to your complaint within a reasonable period. If you are not satisfied with our response to a complaint, or you consider that Kaplan may have breached the Australian Privacy Principles or the Privacy Act, you are entitled to make a complaint to the Office of the Australian Information Commissioner.

The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

How are changes to this Privacy Policy made?

Kaplan may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit this website regularly to keep up to date with any changes.

Contacting Kaplan

The contact details for Kaplan are:

Kaplan Privacy Officer

Kaplan Australia Pty Limited
Level 4, 45 Clarence Street
SYDNEY NSW 2000

Telephone + 61 2 9908 0230

Online <http://www.kaplan.edu.au/>

Email privacy@kaplan.edu.au

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Change and Version Control			
Version	Authored by	Brief Description of the changes	Date Approved
1.0	Quality & Standards Group	Updated to cover outsource arrangement. Inserted version control.	August 2014
2.0	Legal, Regulatory and Compliance team	Review and update to incorporate new contracted service provider functions, revised Group structure and government reporting for quality improvement purposes.	May 2016
2.1	Legal, Regulatory and Compliance team	Review and update to incorporate disclosure for government reporting for immigration monitoring purposes, and a revised corporate group structure.	May 2017
2.2	Legal, Regulatory and Compliance team	Review and incorporate disclosure and reporting for VET statistical reporting purposes.	June 2018