

PRINCIPALS AUSTRALIA INSTITUTE LTD
ACN 163 346 594
("THE INSTITUTE")

Privacy Policy

The Institute's commitment to privacy

The Institute is committed to the protection of personal information and credit related personal information ("**credit information**") and handles all such information in accordance with the *Privacy Act 1988* (Cth) and the 13 Australian Privacy Principles ("**APPs**"). The APPs seek to protect the confidentiality of personal information and to regulate the way personal information is managed.

Personal information includes information or opinions, whether true or not, relating to an individual which can be used to identify that individual. Examples include individuals' names, addresses, contact numbers and email addresses.

The Institute collects and manages personal and credit information to support its services to its members, school leaders and the community.

This policy explains how the Institute collects, uses, discloses and holds personal and credit information and outlines individuals' rights of access to their personal information that the Institute holds. By voluntarily supplying the Institute with your personal information, you are agreeing to be bound by this policy.

Questions concerning this policy or the manner in which the Institute handles personal and credit information may be referred to the Institute on 08 8394 2100 or by email at pai@pai.edu.au (see contact details below).

Information collected and held by the Principals Australia Institute

The Institute may collect the following types of personal and credit information:

- name;
- mailing or street address;
- email address;
- telephone number/s;
- any other contact details provided by the individual;
- age or birth date;
- profession, occupation or job title;
- school or other employer;
- professional association;
- details of professional development activities, conferences or other events, including on-line events and activities, which the individual has purchased or in which the individual has participated or about which the individual has enquired together with any additional information necessary to deliver the Institute's services; and
- information provided through client surveys including online surveys and program evaluation questionnaires.

The Institute may also collect information that is not personal information including anonymous answers to questionnaires and surveys.

How the Institute collects personal information

The Institute collects information directly from individuals through:

- individuals' access to, and use of, the Institute's online services including applications for access to websites;
- online, email and postal registrations for courses, conferences or other events;
- conversations in person or by telephone between individuals seeking information about the Institute's services and representatives of the Institute;
- individuals' purchase orders and payments; and
- individuals' participation in surveys and program evaluations.

In some circumstances, where it is unreasonable or impracticable to collect information from an individual, the Institute may collect information about an individual from a third party source. For example, the Institute may collect information from a publicly maintained record.

With the written consent of individuals or individual children's parents or guardians the Institute may collect photos, videos, audio recordings, comments, articles and examples of children's paintings or written work.

The Institute may also collect personal information through the use of cookies which are small summary files containing a unique ID number sent to individuals' computers when they access a website. Cookies enable the Institute's website to recognise the individual users' computers and to keep records of products or services users view so that the Institute can send advice about products and services of interest. Cookies also enable the Institute to monitor online traffic and to determine which areas of websites are of the greatest interest and value to users. The Institute's cookies do not collect personal information other than individuals' computers' ID numbers. Individuals can set their browsers to stop their computers from accepting cookies.

The Institute may log the electronic addresses of computers connected to the internet to analyse trends in usage and support the administration of websites.

If individuals choose not to provide the Institute with personal information the Institute may be unable to provide requested services at the same standard or at all, provide information about activities, products and services or tailor content to individuals' preferences.

Purposes for which the Institute collects, holds, uses and discloses personal information

Information collected from individuals by the Institute may be collected, held, disclosed and used to:

- maintain registers of users of the Institute's services, participants in Institute programs, subscribers to the Institute's information services, and registered users of secure websites and pages within those websites to support special-interest groups of users;
- provide services including enrolment in courses, conferences, seminars and events;
- provide access to online programs, services, databases and opportunities for professional collaboration;
- distribute newsletters and publications relating to the Institute's activities (unless as requested otherwise);

- process payments and refunds;
- alert individuals to the availability of new products and services (unless as requested otherwise);
- undertake analyses of the professional development needs of school leaders;
- invite participation in surveys relating to school leadership (unless as requested otherwise);
- notify individuals about information or services that may be offered by third parties (unless as requested otherwise);
- undertake administrative, planning, service development, quality control and research activities;
- update records to keep individuals' contact details up to date;
- process and respond to any complaints made by individuals;
- comply with legal obligations; and
- for other purposes related to any of the above.

At any time individuals may opt out of receiving communications from the Institute by contacting the Institute (see the contact information below), or by using opt-out facilities where they are provided in marketing communications. The Institute will ensure that the names of individuals opting out are removed from mailing lists.

With written consent, photos, videos, audio recordings, comments, articles and examples of children's paintings or written work may be used to illustrate or promote the Institute's services.

The Institute will only use your personal information for the purposes for which it was collected ("**primary purpose**") or a purpose related to the primary purpose if this use would be reasonably expected by you, or otherwise, with your consent.

Disclosure of personal information by the Institute

The Institute may disclose personal information to:

- the Institute's employees, contractors or service providers for the purposes of operation of the Institute's supporter and customer services;
- third parties to provide information, products and services to individuals including web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants; and
- any other organisation for any purpose with the express consent of the individual or an individual child's parent or guardian.

Some of the Institute's contracted service providers may be located or based in other countries including, but not limited to, the US, the UK and Singapore. The Institute will use a service provider located in these countries for the purpose of such party processing and hosting personal information for the Institute or otherwise assisting the Institute to provide its services.

Personal information will not be shared or disclosed other than as described in this policy.

The Institute will not provide personal information to other organisations for the purposes of direct marketing.

The Institute does not disclose an individual's credit information to any credit reporting bodies. Any credit information the Institute collect and/or hold about an individual will be dealt with in accordance with this policy.

Access to and correction of information held by the Institute

Individuals may request access to and seek correction of their personal information held by the Institute at any time by contacting the Institute (see the contact information below). Individuals seeking access or updates to their personal information will be required to provide verification of identity and the Institute reserves the right to withhold information if it is not satisfied that an individual is seeking access to his or her own information or is not otherwise authorised to access the personal information. The Institute may charge a fee to cover reasonable costs in providing information. The Institute will clearly communicate and explain any such fee before it is charged.

The Institute will respond to a request for access to or correction of personal information within a reasonable time after an individual makes the request and if access is granted, access will be provided within 30 days from the request. There may be instances where the Institute cannot provide access to personal information. The Institute will, on request provide an individual with access to its personal information or update or correct its personal information, unless the Institute is lawfully excluded from granting the request, including if:

- giving access would be unlawful;
- the Institute is required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

In such circumstances the Institute will provide written reasons for its refusal.

If it is considered that personal information held by the Institute is incorrect, incomplete or inaccurate, individuals may request that it be amended by contacting the Institute (see the contact information below). The Institute will accept a request for correction of credit information where it is satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading.

No charge will be made for correcting personal information.

Where a request for access is accepted, the Institute will provide the individual with access to its personal information in a manner, as requested by the individual, providing it is reasonable and practicable to do so.

Upon accepting a request for correction of personal information, the Institute will take all steps that are reasonable in the circumstances, having regard to the purpose for which the personal information is held, to correct the personal information. If a request for correction of credit information is accepted the Institute will provide written notice of this correction to any entity to which it has disclosed this information previously, to the extent that this is practicable.

Security of personal information held by the Institute

The Institute takes all reasonable steps to ensure that personal and credit information is protected from misuse, loss, unauthorised access, modification or disclosure. The Institute aims to achieve this through:

- imposing confidentiality requirements on its employees;
- implementing policies in relation to document storage security;
- implementing security measures to govern access to its systems;
- only providing access to personal information once proper identification has been given;
- controlling access to its premises; and
- implementing website protection measures

The Institute may hold personal and credit information in either electronic or hard copy form. Any personal or credit information which is collected via the Institute's website, or which is held on its computer systems, is protected by safeguards including physical, technical (including firewalls and SSL encryption) and procedural methods.

Personal and credit information is destroyed or de-identified when no longer required for the purposes for which it was collected.

The Institute's website is linked to the internet which is inherently insecure. Accordingly, any personal information or other information transmitted to the Institute online is transmitted at the risk of the sender.

The Institute's website may contain links to other websites operated by third parties. The Institute is not responsible for the privacy policies or practices of any third party website or for the content of any third party website. Third party websites are responsible for informing users about their own privacy practices.

Dealing with the Institute anonymously

Individuals can deal with the Institute anonymously or using a pseudonym when making a general enquiry about the services the Institute provides.

Individuals may request at the start of any telephone call, in relation to a general enquiry, to remain anonymous or may use a pseudonym.

At the time an individual engages the Institute's services, it is no longer practicable for the individual to deal with the Institute anonymously or using a pseudonym.

Contact information

Complaints or concerns about potential breaches of privacy (including a breach of this policy or the APPs), requests for access to personal information or requests for correction or amendment of information held by the Institute should be referred to:

Privacy Officer
Principals Australia Institute Ltd
205 Greenhill Road
Eastwood, South Australia. 5068.

Telephone: 08 8394 2100
Email: pai@pai.edu.au

The Institute's procedure for investigating and dealing with privacy breaches is an internal review undertaken by the Privacy Officer, who may contact the complainant to seek further information.

The Institute's Privacy Officer will consider a complaint and respond as soon as reasonably possible, but not more than 30 days from receiving the complaint. At the conclusion of that review, the complainant will be provided with a written statement of the outcome and any measures proposed or taken to address defects in the Institute's processes.

For external consideration or review of matters relating to the personal information held by the Institute, complaints may be addressed to the Australian Information Commissioner at:

The Office of the Australian Information Commissioner
GPO Box 5218
Sydney, New South Wales. 2010.

Telephone: 1300 363 992

Online: www.oaic.gov.au

The Institute will review and amend this policy from time to time and suggestions about improving the policy will be welcome. Any amendments to this policy will be notified to you by the Institute posting an updated version of the policy on the Institute's website, www.pai.edu.au.

This privacy policy was last updated December 2017.