Privacy Policy

1. Purpose

UNSW College operates in complex regulatory and privacy compliance regimes established under both the federal and state legislative frameworks.

As a not-for-profit organisation with an annual turnover exceeding $3 million, UNSW College falls within the definition of an ‘organisation’ in the Privacy Act 1988 (Cth) and is required to comply with that act as an “APP entity”. UNSW College is also:

(a) a “related body corporate” of UNSW Sydney as that term is defined by sections 46 and 50 (b) of the Corporations Act 2001 (Cth); and

(b) a “controlled entity” of UNSW Sydney, as that term is defined by section 15A of the University of New South Wales Act 1989 (NSW); and

(c) a “public sector agency” as that term is defined by section 3 (d) of the Privacy and Personal Information Protection Act 1998 (NSW) (PIPPA) and section 4 (d) of the Health Records and Information Privacy Act 2002 (NSW) (HRIPA).

As such, UNSW College may be also required to comply with PIPPA and HRIPA.

UNSW may also collect data on citizens in European Union (EU) countries or process personal data of European residents and as such may need to comply with the General Data Protection Regulation (GDPR).

The purpose of this Policy is to outline:

(a) the Personal Information handling practices of UNSW College,

(b) the way individuals can access their Personal Information to seek the correction of it; and

(c) how individuals may make a complaint to UNSW College about the mishandling of their Personal Information.

2. Scope

This Policy applies to:

(a) all UNSW College staff working for or on behalf of UNSW College;

(b) all UNSW College Students;

(c) parents or guardians of UNSW College Students who are under 18 years of age and School Students; and

(d) third parties, such as customers, Business Partners and Service Providers of UNSW College.

UNSW College is committed to only collect, hold, use and disclose Personal Information that is needed to carry out its functions and activities and to handle the information in accordance with the Privacy Laws and other applicable data protection laws.
2.1. **UNSW College Privacy Policy**

It is UNSW College Policy to:

(a) only collect Personal Information for a lawful purpose, which is directly related to UNSW College’s functions and activities;

(b) not to collect Health Information or Sensitive Information from an individual unless the individual consents to the collection of the information or unless the collection of the information is required or authorised by or under an Australian law;

(c) only collect Personal Information directly from the individual concerned, unless the person has authorised collection from someone else, or where the person is under the age of 16, the information has been provided by a parent or guardian;

(d) inform the person concerned that UNSW College collects their Personal Information, the reason for collecting the information, how it is going to be used and disclosed (if applicable) and how the person can access and correct the information;

(e) use all reasonable endeavours to ensure the collected information is relevant, accurate, complete, up to date and not excessive;

(f) store Personal Information securely and protect it from unauthorised access, use modification or disclosure and destroy or de-activate the information if it is no longer needed;

(g) provide access for individuals to their Personal Information and allow to update, correct or amend their Personal Information where necessary;

(h) only use Personal Information for the purpose it was collected unless the person has given their consent or if exemptions apply;

(i) only disclose Personal Information with a person's consent or if exemptions apply.

3. **Policy statement**

3.1. **UNSW College functions**

UNSW College operates in educational areas that are ancillary to the core business (research and degrees) of UNSW. UNSW College’s core function is education though this is supported by a number of functions including IT, finance, human resources, legal and compliance and sales and marketing.

3.2. **Collecting personal information**

(a) UNSW College may collect the following information:

(b) Personal Information, such as: the individual’s name, date of birth, contact details, including postal and residential address, email address, phone number and/or mobile number (see Appendix 1 for further examples);

(c) Sensitive Information, such as: racial or ethnic origin or criminal record.
(d) Health Information, such as: information or opinion about the health or a disability of an individual, e.g. professional medical practitioner certificates.

(e) UNSW College may collect Personal Information, Sensitive Information and Health Information in a number of ways, including the following:

(f) Directly from individuals or their authorised representative, for example when the individuals: complete online or hardcopy forms; submit assessment materials, applications, instructions or invoices; speak with UNSW College staff in person or by telephone; correspond with UNSW College by letter or email; use UNSW College websites or social media platforms; or participate in UNSW College’s marketing initiatives.

(g) Indirectly from education agents and Service Providers where an individual gave consent for the information to be collected and disclosed to UNSW College, or as otherwise legally permitted by applicable privacy law.

(h) Automatically through digital communication information from search engines or UNSW College website hosts (including through the use of cookies and similar technology). This information includes the individual’s Internet Protocol (IP) address and the web pages visited immediately before and after accessing UNSW website.

(i) UNSW College may collect Personal Information for primary and secondary purposes:

(j) Primary Purposes:

i. Delivery of education services including, but not limited to: recruitment, admission, teaching, assessments, academic administration, research, market research, and analysis of data which includes de-identified Personal Information of UNSW College Students or prospective students.

ii. Interactions with UNSW Sydney as UNSW College’s parent entity, for example, for the purpose of managing emergencies; facilitating access by UNSW College Students to UNSW services and support, either in their capacity as UNSW College students or when transitioning to UNSW Sydney to commence studies at UNSW Sydney; collaborating with UNSW Sydney for commercial purposes, including but not limited to conducting tests and research; reporting to UNSW Sydney as a controlled entity and as an entity that delivers educational services under UNSW Sydney’s CRICOS code.

iii. (Conducting its business operations including, but not limited to: dealing with requests, enquiries or complaints from UNSW College Students, School Students and their parents or guardians; facilitating fee payments and refunds; dealing with UNSW College’s customers, Business Partners and Service Providers, and other third parties, such as banks and financial service providers; for Human Resources purposes (including health and safety risk management); or for interacting with other organisations and companies.
(k) Secondary Purposes:

(l) Showcasing achievements of UNSW College Students and School Students, for example, in student graduation books or year books, testimonials, in-house videos or Student Newsletters;

(m) Marketing, advertising and promoting UNSW College products and services for example, in marketing materials, testimonials, via the UNSW College website and through social media.

(n) UNSW College informs individuals that it collects their Personal Information, either at or before the time of collection, or as soon as practicable thereafter, either through a form used to collect the information or by giving a notice to individuals or by otherwise ensuring that the individuals are aware of the collection of their Personal Information. The notification will be in writing wherever possible.

(o) Further examples of UNSW College’s functions and activities and the type of Personal Information collected are outlined in Appendix 1.

3.3. Consent

Where necessary and as required by law, UNSW College may seek specific consents from an individual to collect, use and disclose the individual’s information.

(a) Consent must be sought when:

(b) UNSW College collects Sensitive Information about an individual, unless the collection of the information is required or authorised by or under an Australian law or a court/tribunal order;

(c) The use or disclosure of Personal Information is not directly related to the primary purpose of collection, unless:

(d) the individual would reasonably expect UNSW College to use or disclose the information for the secondary purpose or the use; or

(e) the disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order;

(f) UNSW College collects and uses Personal Information, such as testimonials or photos of an individual in marketing or advertising materials. Note, consent is only required where the person's identity is clear or can reasonably beascertained from an image or a video, and in case of testimonials, where the testimonial contains personally identifiable information. UNSW College staff may obtain copies of the Student Consent Form and the Parent/Guardian Consent Form as relevant to their activities by visiting the Forms page on the UNSW College website or UNSW College intranet.

(g) The use or disclosure of Personal Information is for the purpose of direct marketing, unless certain exceptions under the law apply;

(h) UNSW College discloses Personal Information about an individual to an Overseas Recipient, unless:
(i) the Overseas Recipient of the information is subject to a law that has the effect of protecting the information similar to the Australian Privacy Principles; and

(j) there are mechanisms that the individual can access to take action to enforce that protection of the law; or

i. the disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or

ii. the disclosure of the information is required or authorised by or under an international agreement relating to information sharing to which Australia is a party; or

iii. UNSW College reasonably believes that the disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body, and the Overseas Recipient is a body that performs functions, or exercises powers, that are similar to those performed or exercised by an enforcement body.

3.4. Consent is not required

Consent is not required if there is a Permitted General situation, for example, UNSW College reasonably believes that the collection, use or disclosure is necessary:

(a) to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety;

(b) where UNSW College has reason to suspect that unlawful activity, or misconduct of a serious nature that relates to UNSW College’s functions or activities has been, is being or may be engaged in, the collection, use or disclosure is necessary in order for UNSW College to take appropriate action in relation to the matter; or

(c) UNSW College reasonably believes that the collection, use or disclosure is reasonably necessary to assist any APP entity, body or person to locate a person who has been reported as missing.

3.5. Anonymity and pseudonymity

(a) For most of its functions and activities, UNSW College needs Personal Information from identifiable individuals to perform its operations, e.g. to deliver educational services, to conduct educational assessments, or to handle an inquiry or complaint etc.

(b) Where practicable, an individual can choose not to identify themselves or to use a pseudonym. For example, if an individual calls UNSW College to make a simple enquiry, they will not be asked about their name and contact details unless this information is needed to provide a response.

3.6. Storage, security and disposal

(a) Where practicable, UNSW College will seek to ensure that Personal Information is stored securely within Australia.
(b) Where UNSW College engages Service Providers to store Personal Information, UNSW College will seek assurance in its contracts with the Service Providers that they will comply with applicable privacy and data protection law.

(c) UNSW College has processes in place to limit access to Personal Information and to prevent unauthorised access, by using measures, such as: user identification, the encryption of data or different level of user access.

(d) UNSW College staff are permitted to email or otherwise transfer Personal Information held on UNSW College’s systems to outside systems (such as their personal email accounts or file hosting services) only if it is if absolutely necessary, i.e., for a justified academic, research or business need, and if it is done in accordance with the UNSW College Information Security Policy, Bring Your Own Device Policy and relevant procedures.

(e) UNSW College will securely destroy or de-identify Personal Information it holds once the Personal Information is no longer needed for any purpose for which the information was collected. This requirement does not apply where the Personal Information is contained in a Commonwealth or state record (for the purposes of records retention laws) or where UNSW College is otherwise required by law to retain the information.

3.7. Direct marketing

(a) UNSW College may use Personal Information collected directly from an individual for the purpose of direct marketing, provided that individual has opted in to receive such communications.

(b) An individual can request not to receive direct marketing communications from UNSW College by opting out of receiving future emails or SMSs.

(c) UNSW College provides information about how to opt out in each direct marketing communication.

3.8. Disclosing personal information

(a) UNSW College is a related body corporate and a controlled entity of UNSW Sydney. Section 13B of the Privacy Act 1988 (Cth) permits UNSW College to disclose Personal Information to UNSW Sydney as is necessary to carry out its activities and functions, including those set out in paragraphs 5.1 and 5.2 above and in Appendix 1.

(b) UNSW College may disclose Personal Information to other third parties in the following cases:

(c) to UNSW College’s agents, consultants, contractors and Service Providers who assist UNSW College in running its business or provide related services, and who are subject to security and confidentiality obligations;

(d) to UNSW College Business Partners, to the extent they are involved in the provision of UNSW College services to customers;

(e) where an individual has consented the disclosure to a third party; or
(f) if the law allows or requires UNSW College to do so.

(g) UNSW College will not disclose Sensitive Information without obtaining the consent of the individual unless the disclosure is necessary to prevent a serious and imminent threat to the life or health of the individual concerned or another person or in accordance with section 16A of the Privacy Act (Cth).

(h) While UNSW College’s main teaching venues are in New South Wales, it operates in more than 20 countries worldwide, predominantly in the Asia-Pacific region. UNSW College may disclose Personal Information, outside New South Wales, to Commonwealth government agencies or to Overseas Recipients where:

(i) UNSW College has taken reasonable steps to ensure the Overseas Recipient does not breach the Privacy Principles in relation to the information; or

(j) UNSW College reasonably believes that the Overseas Recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles protect the information, and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme;

(k) the individual has expressly consented for UNSW College to do so; or

(l) as set out in paragraph 5.3.2 of this Policy.

3.9. Privacy Impact Assessment

When developing or reviewing a project, such as: new or amended programs, activities or databases, UNSW College may consider the need for a Privacy Impact Assessment (PIA). A PIA identifies how a project can have an impact on individuals’ privacy, and makes recommendations for managing, minimising or eliminating privacy impacts.

3.10. Notifiable Data Breach

In the case of an Eligible Data Breach, UNSW College will inform the OAIC and affected individuals in the manner required by the Privacy Act 1988 (Cth).

3.11. The General Data Protection Regulations (GDPR)

The GDPR and the Privacy Act 1988 (Cth) share many common requirements, however, there are also some notable differences. Where UNSW College is engaging in business in the European Union that is likely to result in data being collected or processed in relation to European residents, the Legal and Compliance team needs to be consulted, who can advise on the nature of responsibilities that UNSW College may have under the GDPR, before commencement of activities.

3.12. Accessing and correcting Personal Information

If an individual believes that the Personal Information which UNSW College holds about them is inaccurate, out-of-date, incomplete, irrelevant or misleading they have the right to request the information to be corrected.
To request amendment of his/her Personal Information, the individual should:

(a) Provide his/her personal and contact details, and describe the Personal Information about him/her that they would like to amend, providing the reasons that he/she considers the information to be incomplete, incorrect, out-of-date, or misleading;

(b) Send the request to the attention of the UNSW College Privacy Officer:
   By email: legalandcompliance@unswcollege.edu.au
   By post: Legal and Compliance Team
   UNSW Global Pty Limited
   223 Anzac Parade
   Kensington NSW 2033

(c) To prevent adverse consequences of unauthorised disclosure of Personal Information, UNSW College will verify the individual’s identity and authority to request the change prior to processing the request.

(d) There is no fee to request correction of Personal Information.

(e) UNSW College will aim to respond to the request within 30 days.

3.13. Complaints about handling Personal Information

If an individual believes that UNSW College has misused their Personal Information they can contact the UNSW College Privacy Officer to discuss and try to resolve the issue informally, or lodge an application for a formal review with UNSW College, or complain to the OAIC.

Please note that the OAIC generally requires individuals to complain directly to the agency or organisation (in this case, UNSW College) and allow thirty (30) days for it to respond before the individual can lodge a complaint with the OAIC.

To lodge an application for a formal review with UNSW College, an individual should:

(a) Complete a Complaint Form in line with the UNSW College Student Grievances and Complaints Policy within twelve (12) months of the time an individual became aware of the misuse of their personal information. The Complaint Form is available at Appendix 2 of this Policy.

(b) The complaint can be made about:
   i. Collection of Personal Information;
   ii. Security or storage of Personal Information;
   iii. Refusal to access or find out about Personal Information;
   iv. Accuracy of Personal Information;
   v. Use of Personal Information; and
   vi. Disclosure of Personal Information.

(c) Email or post the Form to the UNSW College Privacy Officer.
(d) The individual will be informed in writing of the result of the review.

(e) UNSW College aims to respond to the complaint within ten (10) working days. If the complaint is complex and requires more extensive investigation, UNSW College will use all reasonable endeavours to complete the review within thirty (30) days.

(f) If the individual is unhappy with the result of the review he/she can lodge a complaint with the OAIC. Information on how to lodge a complaint can be found on the OAIC website.

4. Roles, responsibilities and delegations

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head of Legal and Compliance</td>
<td>Implementing, disseminating and reviewing this Policy.</td>
</tr>
<tr>
<td>Legal Counsel</td>
<td>The day to day implementation of this Policy and being the first point of contact for all enquiries that relate to this Policy.</td>
</tr>
</tbody>
</table>

5. Definitions

<table>
<thead>
<tr>
<th>Definitions and Acronyms</th>
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</thead>
<tbody>
<tr>
<td>Academic progression</td>
<td>The process by which a student advances in their program of study, through progressively meeting the academic and administrative requirements for the program.</td>
</tr>
<tr>
<td>Academic Standing</td>
<td>The status of a student’s progress towards meeting the requirements for their program.</td>
</tr>
</tbody>
</table>

6. Policy Governance

<table>
<thead>
<tr>
<th>Privacy Policy</th>
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<tbody>
<tr>
<td>Category/Business Group</td>
<td>Legal and Compliance</td>
</tr>
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<td>Published Externally (Yes/No)</td>
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</tr>
<tr>
<td>Approver</td>
<td>Chief Executive Officer</td>
</tr>
<tr>
<td>Responsible Officer</td>
<td>Chief of Staff</td>
</tr>
<tr>
<td>Contact Officer</td>
<td>Head of Legal and Compliance</td>
</tr>
<tr>
<td>Effective Date</td>
<td>17/08/2023</td>
</tr>
<tr>
<td>Next Review Date</td>
<td>17/08/2026</td>
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<tr>
<td>Version</td>
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### Revision History

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<th>Approval date</th>
<th>Effective date</th>
<th>Sections modified</th>
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<tr>
<td>1</td>
<td>Sarah Lightfoot - Chief Executive Officer</td>
<td>11 August 2023</td>
<td>17 August 2023</td>
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Please visit our website to ensure that you have the latest version of this Policy. Policies are available at: [unswcollege.edu.au/about/policies](http://unswcollege.edu.au/about/policies)
# Annexure 1

<table>
<thead>
<tr>
<th>Business Group</th>
<th>Functions and Activities</th>
<th>Type of Personal Information Collected</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Academic, student administration/services and recruitment</strong></td>
<td>Delivering English language programs and university pathway programs to UNSW Sydney and other universities</td>
<td>Examples: UNSW College Students: • name • physical address • mobile phone number • landline • social media contact details • student and personal email addresses • date of birth • gender • citizenship • passport number • student visa • academic records and transcripts • enrolment details • student number • Unique Student Identifier (for domestic students in certain English courses) • assessment results • records relating to complaints, appeals, grievance procedures or misconduct • photographs, videos or other recordings that identify the UNSW College Student • if a parent or guardian, their relationship to the UNSW College Student • health and other Sensitive Information where this affects a UNSW College Student’s progress or assessment, the management of emergencies or other aspects of a person’s welfare • in the context of a complaint, Personal Information about the complainant and others who are involved, in order to deal with the complaint</td>
</tr>
<tr>
<td><strong>Academic, student administration/services and recruitment</strong></td>
<td>International student recruitment, admissions, academic administration and student services</td>
<td>Examples of activities: • receiving and considering Student applications • where UNSW College Students have applied through an Australian or overseas agent, sharing information about the UNSW College Student with the agent • administering complaints and appeals processes • administering disciplinary processes • providing administrative services for a wide range of matters including UNSW College Student enrolment, progress and welfare • responding to queries (whether online, over the phone or in person) • managing adjustments for UNSW College Students with a disability • assisting when UNSW College Students ask for help on personal issues (eg referrals to counsellors, liaising with doctors and other specialists and UNSW Sydney) • providing recreational activities, support services and social events for UNSW College Students, such as excursions, graduation ceremonies, year books, • assisting UNSW College Students who transition to</td>
</tr>
<tr>
<td>Business Group</td>
<td>Functions and Activities</td>
<td>Type of Personal Information Collected</td>
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</tbody>
</table>
| UNSW Sydney after completing their studies with UNSW College  
- dealing with third parties that provide goods or services to UNSW College Students where we have been involved in procuring the good or service for the student (eg health insurance providers)  
- communicating with UNSW College Students about matters related to their study  
- to confirm a student’s identity at assessments  
- marketing UNSW College’s services through all forms of media (including our website, social media pages, brochures and pamphlets)  
- conducting research and analysis (including market research)  
- managing emergencies  
- communicating with UNSW College students about emergencies identified by UNSW Sydney | misconduct proceedings,  
Personal Information about the UNSW College Student in question and others who are involved, in order to deal with the matter |

<table>
<thead>
<tr>
<th>Other UNSW College Business Groups</th>
<th>Human Resources</th>
<th>Examples of types of Personal Information about staff or applicants</th>
</tr>
</thead>
</table>
| Other UNSW College Business Groups perform business support functions such as Human Resources, Finance, IT, Marketing and Legal and Compliance. These Business Groups support | recruiting new staff  
- maintaining staff records  
- managing staff performance management, complaints, misconduct and grievance procedures  
- managing adjustments for staff with a disability or health condition as applicable  
- assisting where staff ask for help with personal issues  
- staff health and safety risk management | name  
- residential address  
- mobile phone number  
- landline  
- personal email addresses  
- work email address  
- date of birth  
- gender  
- employment history  
- qualifications, education and training  
- academic transcripts  
- employer references  
- criminal history (where relevant) |
<table>
<thead>
<tr>
<th>Business Group</th>
<th>Functions and Activities</th>
<th>Type of Personal Information Collected</th>
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</thead>
<tbody>
<tr>
<td><strong>UNSW College’s core activities.</strong></td>
<td></td>
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</table>
| | | to position)  
• Working with Children Check (where relevant to position)  
• in the context of a complaint, Personal Information about the complainant and others who are involved, in order to deal with the complaint.  
• health information  
• in the context of disciplinary or misconduct proceedings, Personal Information about the staff in question and others who are involved, in order to deal with the matter |
| **Finance and Facilities** | Examples of types of Personal Information | |
| • managing UNSW Global Student fees and payment matters | • information in relation to staff salaries and benefits  
• Payee identity checks for refunds  
• staff bank account information  
• work location (as updated from time to time across authorised worksites) |
| • managing staff payroll and benefits | |
| • managing staff use of corporate credit cards | |
| • workspace resource management (such as desk and meeting room bookings) | |
| **IT** | Examples of types of Personal Information | |
| • managing the access controls, security and integrity of data held in College’s information systems, including  
  o databases (e.g. UNSW College Student information databases managed by College’s Admissions team and employee data managed by our HR team)  
  o content management systems (such as our contracts management system)  
• outsourcing IT functions to third parties (such as cloud service providers) where such parties are subject to confidentiality and | |
| Examples of types of Personal Information about staff, visitors, and UNSW College Students | IT has a role in supporting all College’s systems which contain Personal Information. Examples of Personal Information which IT handles in a more direct way include:  
• usernames and passwords  
• email addresses  
• IP addresses  
• use and consumption of UNSW College’s developed or procured IT products and services (e.g. websites, business software and digital devices). |
<table>
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<th>Functions and Activities</th>
<th>Type of Personal Information Collected</th>
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<tbody>
<tr>
<td></td>
<td>security obligations</td>
<td>Examples of types of Personal Information about UNSW College Students, staff and School Students</td>
</tr>
<tr>
<td></td>
<td>• managing data back-up processes</td>
<td>• name</td>
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<tr>
<td>Marketing</td>
<td>• preparing, publishing or distributing advertising, promotional and other marketing material (e.g. on our website, social media pages, hard copy brochures, handbooks and pamphlets, video testimonials)</td>
<td>• physical address</td>
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<td></td>
<td>• running recruitment and promotional events (e.g. at careers fairs)</td>
<td>• mobile phone number</td>
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<tr>
<td></td>
<td>• running trade promotions</td>
<td>• landline</td>
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<td></td>
<td>• communicating with UNSW College Students or potential UNSW College Students for marketing purposes (including by email or mobile phone where UNSW College Students have opted in to receive such communications, but we will always provide a straightforward way of opting out)</td>
<td>• social media contact details</td>
</tr>
<tr>
<td></td>
<td>• collecting data, conducting research and performing analysis to improve existing, and develop new, products and services</td>
<td>• UNSW College Student and School Student and personal email addresses</td>
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<tr>
<td></td>
<td>Examples of types of Personal Information about UNSW College Students, staff and School Students</td>
<td>• date of birth</td>
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<tr>
<td></td>
<td>• staff complaints, misconduct or disciplinary matters</td>
<td>• job title (if a staff)</td>
</tr>
<tr>
<td></td>
<td>• student number (if a UNSW College Student)</td>
<td>• student number (if a UNSW College Student)</td>
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<td></td>
<td>• photographs, videos or other recordings that identify the UNSW College Student, staff or School Student (though we will seek specific consent unless it is not reasonably practicable to do so)</td>
<td>• photographs, videos or other recordings that identify the UNSW College Student, staff or School Student (though we will seek specific consent unless it is not reasonably practicable to do so)</td>
</tr>
<tr>
<td></td>
<td>All the types of Personal Information we hold, including the examples in this table.</td>
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<tr>
<td>Legal and compliance</td>
<td>Advising UNSW College on the following:</td>
<td></td>
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<tr>
<td></td>
<td>• its legal rights and obligations in relation to UNSW College Students or School Students; parents or guardians of Under 18 UNSW College Students or School Students; staff; and third parties such as customers, Business Partners and others</td>
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<tr>
<td></td>
<td>• regulatory compliance matters</td>
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<td>• Student complaints, misconduct or disciplinary matters</td>
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<td>• negotiating and managing contracts&lt;br&gt;• litigation and disputes to which it is a party&lt;br&gt;• briefing external solicitors, barristers and other advisers&lt;br&gt;agreements and arrangements with UNSW</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>All UNSW College Business Groups</th>
<th>Engaging third party suppliers (e.g. cloud service providers, IT providers and consultants) to enable UNSW College to improve its infrastructure, systems, processes, products and services</th>
<th>All the types of Personal Information we hold, including the examples in this table.</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Business Groups</td>
<td>All interactions with UNSW as UNSW College’s parent entity, including:&lt;br&gt;• administering packaged offers of admission to UNSW College and UNSW&lt;br&gt;• managing emergencies (including calling or texting UNSW College Students and UNSW College staff on their mobile or other devices);&lt;br&gt;• facilitating access by UNSW College Students to UNSW services such as UNSW Disability Services, counselling and health services&lt;br&gt;• complaints, disciplinary and misconduct matters affecting UNSW College or UNSW&lt;br&gt;• working with UNSW Sydney to improve existing, and develop new, products and services to UNSW College Students or UNSW students (which may involve collecting and sharing data with UNSW Sydney, and performing research and analysis)&lt;br&gt;• maintaining and developing</td>
<td>All the types of Personal Information we hold, including the examples in this table.</td>
</tr>
<tr>
<td>Business Group</td>
<td>Functions and Activities</td>
<td>Type of Personal Information Collected</td>
</tr>
<tr>
<td>----------------</td>
<td>--------------------------</td>
<td>----------------------------------------</td>
</tr>
<tr>
<td></td>
<td>UNSW and UNSW College’s business infrastructure, services, systems and processes.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Exercising our rights, or fulfilling our obligations under, a contract with an individual.</td>
<td>All the types of Personal Information we hold, including the examples in this table.</td>
</tr>
<tr>
<td></td>
<td>• Communicating with customers in order to improve our services.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Sending information and material that are related to UNSW College services or that may be of interest to a customer.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Any other purpose for which Personal Information was provided to UNSW College or for any purpose related or ancillary to any of the above.</td>
<td></td>
</tr>
</tbody>
</table>
## Annexure 2 - Complaint Form

<table>
<thead>
<tr>
<th>Full Name</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Postal Address</td>
<td></td>
</tr>
<tr>
<td>Phone Number</td>
<td></td>
</tr>
<tr>
<td>Email Address</td>
<td></td>
</tr>
</tbody>
</table>

Please tick which of the following describes your complaint: *(you may tick more than one option):*

- [ ] collection of my Personal, Sensitive or Health Information
- [ ] security or storage of my Personal, Sensitive or Health Information
- [ ] refusal to let me access or find out about my own Personal, Sensitive or Health Information
- [ ] accuracy of my Personal, Sensitive or Health Information
- [ ] use of my Personal, Sensitive or Health Information
- [ ] disclosure of my Personal, Sensitive or Health Information
- [ ] other *(please specify)*:

Please describe the details of your complaint and dates where relevant

<table>
<thead>
<tr>
<th>Attached documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ] I am attaching supporting documents</td>
</tr>
<tr>
<td>[ ] I am not attaching supporting documents</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>

**Office Use Only**

<table>
<thead>
<tr>
<th>Received by</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td>Date</td>
</tr>
</tbody>
</table>

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