

Privacy Policy

The privacy of your personal information is afforded the highest level of importance by Enterprise Risk Management Solutions ('erms') (RTO ID 40357)

Erms complies with the Privacy Act 1988 (Cth) including the 13 Australian Privacy Principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 regarding the manner in which we handle your personal information and how we respond to your requests to access and correct it. This policy document sets out our information handling procedures and the rights and obligations that both you and we have in relation to your personal information.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from July 2014.

The kinds of personal information we collect

We will only collect personal information where it is reasonably necessary to do so for the conduct of our business.

In the course of our business, we may collect and hold personal information about a range of people, including:

- Clients (including students), potential clients and their employees;
- current, former and prospective employees and contractors; and
- other persons who may come into contact with us.

The kinds of personal information that we collect and hold may include:

- Contact details including postal and residential addresses, telephone and facsimile numbers, and email addresses
- Employment details
- Educational background
- Demographic Information
- Course progress and achievement information
- Financial billing information.

The following types of sensitive information may also be collected and held:

- Identity details
- Employee details & HR information
- Complaint or issue information
- Disability status & other individual need

- Indigenous status
- Background checks (such as Police Checks)
- Billing and credit card information;

If you do not provide us with personal information that we request, this may affect our ability to provide services to you or to engage you to provide services to us (as the case may be).

How we collect personal information

Erms collects information from you to facilitate the provision of our services. We collect personal information in the following ways:

- course enrolment forms
- in correspondence from our clients (including students), potential clients and their employers.

Any collection of personal information by us will be fair and lawful.

If it is reasonable and practical do so, we will collect personal information about you only from you.

In the course of our business, it may be necessary to collect personal information about an individual from a third party, such as a student's employer. If we collect personal information about you from a third party we will, where required, take reasonable steps to ensure that you are notified or aware that we are holding personal information about you, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

How we hold personal information

We will hold personal information in physical records and electronic records on our servers.

We take reasonable steps to hold all hard copy and electronic records of your personal information in a secure manner to ensure that it is protected from misuse, interference and loss, and unauthorised access, modification or disclosure.

Upon collection, information is:

- As soon as practical converted to electronic means
- Stored in secure, password protected systems, including system and student management system; and
- Monitored for appropriate authorised use.

Erms takes measures to consider whether we are able to retain personal information we hold.

Erms takes steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

Only authorised personnel are provided with access to systems storing personal information. **erms** IT systems are hosted internally with internal security to physical server locations and server systems access. Virus protection, backup procedures and ongoing access monitoring procedures are in place.

We destroy or de-identify all personal information once it is no longer needed for a valid purpose or required to be kept by law.

The purposes for which we collect, hold, use and disclose personal information

Erms must collect, hold, use and disclose information from our clients for a range of purposes, including but not limited to:

- Providing services to clients (including students)
- Managing employees and contractors
- Promoting products and services
- Conducting internal business functions and activities.

As a government registered training organisation, regulated by the Australian Skills Quality Authority, **erms** is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants in nationally recognised training programs. This information requirement is outlined in the National Vocational Education and Training Regulator Act 2011 and associated legislative instruments. In particular, the legislative instruments:

- Standards for NVR Registered Training Organisations 2012
- Data Provision Requirements 2012.

We will, wherever possible, keep all personal information strictly confidential. However, in the course of providing our services, we may need to disclose information to other third parties, including other parties involved in training accreditation or regulatory authorities. The precise information required to be provided will vary depending on the circumstances requiring disclosure of that information.

We may also use and disclose personal information about you:

- for purposes necessary or incidental to the provision of our services (including training)
- to send you direct marketing materials, updates or event invitations
- where the use or disclosure is required or authorised by law
- where you have given us your consent (express or implied)

- to avoid, lessen or prevent a serious emergency or crime. If we use or disclose personal information about you in those circumstances we will make a written record of such use or disclosure.

You may opt out of receiving direct marketing materials from us at any time by contacting us at admin@erms.com.au **Attn: Privacy** or +61 8 8271 5007.

Access and correction of personal information

You may request access to or correction of your personal information at any time by sending a written request to admin@erms.com.au **Attn: Privacy**. We will take reasonable steps to give you access in the manner you have requested, or make the corrections you have requested, and will respond within a reasonable time.

You do not need to provide a reason for your request. We may charge a small fee for providing access if it requires a significant amount of time to locate or collect your information or to present it in an appropriate form. We will not charge you for requesting that we update or correct your personal information.

Under the Privacy Act we are entitled to deny access in various circumstances, such as where the requested access will have an unreasonable impact upon the privacy of others or where we are required by law to withhold the information.

If we deny you access to your information, or are not able to make any amendments which you have requested, we will provide you with reasons for our refusal.

Cross-border disclosures of information

We may disclose personal information to overseas recipients:

- where you have given us your consent (express or implied)
- where the overseas recipient is an organisation involved in the accreditation of the training you undertake with us
- to the extent necessary to deliver our services.

The countries in which such recipients are located will depend on the nature of the services being provided by us.

By providing us with your personal information, you consent to the storage of such information on overseas servers and you acknowledge and agree that APP 8.1 will not apply to the extent that such storage constitutes a cross-border disclosure. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able seek redress under, the Act.

Contact

If you wish to contact us, for example if you believe that we may have breached our obligations or failed to comply with this policy in the handling, use or disclosure of your personal information, you may make contact us addressed to Privacy:

- by mail to ERMS, PO Box 820, Unley SA 5061
- by facsimile on 08 8271 5008
- by email to admin@erms.com.au Attn: Privacy

Complaints

We take all complaints seriously, and will investigate and respond to your complaint within a reasonable period.

If are not satisfied with our response, you may contact the Office of the Australian Information Commissioner:

- by mail to Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001
- by telephone on 1300 363 992
- by email to enquiries@oaic.gov.au

Additional information

We will comply with all relevant legislative requirements if and when they are applicable to ERMS. However, in the event of any inconsistency, the legislative requirements will override the provisions of this document.

This document reflects our Privacy Policy as at July 2014. We may amend our Privacy Policy at any time and will make the updated version available on our website.