



# AEPL Privacy Policy

*October 2024*

Authorised by	Authorisation date	Effective date	Next Review
AEPL Chairperson	10 October 2024	10 October 2024	October 2026

# Privacy Policy

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## 1. Application of Policy

This Privacy Policy describes how Association for Educational Projects Limited (ABN 22 001 350 410) and its Study Centres namely, Eremeran Hills, Heathgrove, Lowana and Merindah complies with the requirements of the *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles, and any other applicable privacy laws in Australia.

This Privacy Policy sets out how we handle your personal information to comply with our obligations and protect your privacy.

In this Privacy Policy:

**“Act”** means the *Privacy Act 1988 (Cth)*.

**“APPs”** means the Australian Privacy Principles.

**"personal information"** has the same meaning as defined in the Act and generally means any information about you that identifies you or from which your identity reasonably can be determined.

**“we”, “us”, “our”** and **"AEPL"** refer to Association for Educational Projects Limited (ABN 22 001 350 410) and its Study Centres namely, Eremeran Hills, Heathgrove, Lowana and Merindah.

**“Website”** refers to the website located at [aepl.org.au](http://aepl.org.au), [eremeran.org.au](http://eremeran.org.au), [heathgrove.org.au](http://heathgrove.org.au), [lowana.org.au](http://lowana.org.au), [merindah.org](http://merindah.org).

## 2. Scope

AEPL carries out activities and provides services and programs across Australia for or related to the purposes of promoting education and development of character through educational, recreational, social and volunteering programs.

### **What kinds of personal information do we collect, use and hold?**

The kinds of personal information that we may collect, use and hold vary depending on the purpose(s) for which it is collected. It may include (but is not limited to) your name, contact details, date of birth, sensitive information such as information relating to ethnic origin, language spoken and religious beliefs and health information and any other information that is relevant to our functions and activities.

We collect personal information from people who are connected to our operations and activities. This includes, but is not limited to, recipients of our services and employees.

### **How do we collect personal information?**

Personal information may be collected directly by AEPL, or by people/organisations acting on behalf of AEPL. Additionally, personal information may be collected from the Website.

We usually collect personal information directly from individuals.

In some instances, we may collect personal information about individuals from third parties such as the individual's friends or relatives.

When you provide us with personal information about other individuals, you should make them aware of this Privacy Policy and obtain their consent to you providing their details to us.

We may collect your personal information when you engage with us, such as when you:

- make a tax deductible donation to any of AEPL's building funds;
- submit an application to enrol yourself or your child/ren in any of our programs;
- register for the summer camp or any of our social outreach projects. In addition to the foregoing, AEPL may also record on video parts of and publish such programs, activities, and events;
- make enquiries about us or our services;
- lodge a residential application form to AEPL; or
- contact us for any other reason so that we can process, deal with and respond to your queries or other issues, including any complaints.

### **Why do we collect, use, hold and disclose your personal information?**

We collect, use, hold and disclose your personal information when it is reasonably necessary for purposes directly related to our programs and activities or to assist you should you have an enquiry, and for secondary purposes for which you reasonably expect us to use or disclose your personal information.

Such purposes include to:

- provide information about our programs and activities to participants and parents;
- send relevant information, advertisements, and other marketing information to individuals on our mailing lists;
- enable Study Centre program leaders or mentors to contact parents or guardians and children, where appropriate and with express permission from their parent or guardian;
- review and assess your application for a place in one of our residences;
- issue you with a tax receipt for your donation;
- manage our organisation, including the Website; and
- comply with our legal obligations.

### **Do we use cookies or other web tracking systems?**

When you access the Website, our server makes a record of your visit and logs information such as the user's server address, the date and time of visit to the site and the pages accessed and documents downloaded from the site.

The data listed above is collected for the purposes of website and system administration, including monitoring to prevent security breaches, enhancement of the Website to the user's needs and research and development.

As part of its functionality, the Website also uses "cookies". A "cookie" is a small amount of electronic data that is often used by a "host computer" (for example, the computer on which the Website is hosted) and a "local computer" (that is, the computer that you use to browse the Website) to communicate information back and forth. Cookies may be used by the Website in order to obtain statistical data. No personal information will be collected via the use of cookies.

If you do not want information collected through the use of cookies, there is a procedure in most browsers that allows you to deny or accept the cookie feature. However, you should note that cookies may be necessary to provide you with some features of our online services.

### **3. Disclosure of your personal information**

#### **General Disclosure**

We will not use or disclose any personal information that we collect about you other than for the purpose for which you have given it to us or a secondary purpose that is related to the primary purpose of collection (for example, if it is necessary to make such disclosures to a relevant organisation in order for you to receive the services you have requested or if you would reasonably expect such disclosures, or have been told, that information of such a nature is usually disclosed to third party individuals, bodies or agencies). For example, we may disclose personal information to third parties such as:

- NSW Office of the Children's Guardian;
- ACT Children and Young People Commissioner;
- Queensland Family and Child Commission;
- Victoria Commission for Children and Young People;
- Office of the Children's Commissioner Northern Territory;
- South Australia Office of the Guardian for Children and Young People;
- Western Australia Commissioner for Children and Young People; and
- Tasmania Commissioner for Children and Young People,

with respect to any matters relating to the Reportable Conduct Scheme.

Other than the above, we will not, in the course of our operations, disclose personal information to any outside parties without your consent, unless we are authorised or required to make a disclosure by law, or if otherwise permitted under the Act.

#### **Do we disclose personal information overseas?**

We use google drive to store your personal information. Google drive may use offshore data storage. We otherwise do not send personal information overseas.

### **4. Unsubscribing from marketing materials**

If at any time you do not wish to continue to receive particular information from us or one of our Study Centres, you may contact the relevant Study Centre directly or contact AEPL at [admin@aepl.org.au](mailto:admin@aepl.org.au) to request that your name be removed from a mailing list, for a publication or other marketing materials.

Eremeran Hills Study Centre, contact [admin@eremeran.org.au](mailto:admin@eremeran.org.au)

Heathgrove Study Centre, contact [activities@heathgrove.org.au](mailto:activities@heathgrove.org.au)

Lowana Study Centre, contact [admin@lowana.org.au](mailto:admin@lowana.org.au)

Merindah Study Centre, contact [merindahstudycentre@gmail.com](mailto:merindahstudycentre@gmail.com)

## **5. Dealing with us anonymously or using a pseudonym**

You may deal with us on an anonymous basis or by using a pseudonym when making enquiries through our Website, or when you make general enquiries by telephone and do not require a further response from us. However, we may need certain contact details from you to respond to enquiries.

Generally, we will require your personal information in order to transact with you.

## **6. Security and integrity of personal information**

We will use all reasonable efforts to maintain the integrity of your personal information. We have established procedures to assist in keeping personal information up to date.

Once personal information is no longer required by us for the purposes for which it was collected or held or otherwise in accordance with the APPs or required of us by law, we will take all steps as are reasonable in the circumstances to ensure that it is either destroyed or de-identified.

We take reasonable steps to protect any personal information that we hold from misuse and loss. We also take reasonable steps to protect that information from unauthorised access, modification and disclosure.

We have internal policies in place to manage access privileges, to ensure that only those who really need to can see your personal information.

We maintain physical security, such as locks and security systems, over our electronic data servers, computers and premises. We also maintain up-to-date computer and network security, for example firewalls, anti-virus software, identification codes and passwords and other security measures, in order to control access to computer systems. We also regularly back-up our electronic data to minimise loss of data in the event of system failures.

No data transmission over the internet can be guaranteed to be 100% secure. While we strive to protect your personal information from misuse, loss or unauthorised access, we cannot guarantee the security of any information you transmit or receive from our online service. These activities are conducted at your own risk. As soon as we receive your transmission we make our best efforts to ensure its security.

## **7. Access, correction and removal of your personal information**

You may seek to access or correct your personal information at any time by contacting the relevant Study Centre that holds your information.

We will endeavour to take all reasonable steps to keep any information that we hold about you accurate and up-to-date. If, at any time, you discover that information held about you is incorrect, misleading or outdated or if you otherwise wish to review or correct that information, please contact us.

There are circumstances where, by law, we may not give you access to the personal information we hold about you. For example, we cannot give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

If we do not agree to provide you with access to your personal information or to amend or annotate the information we hold about you, you may seek a review of our decision.

If we do not agree to make the requested changes to your personal information, you may make a statement about the requested changes and we will attach it to your record.

## **8. Complaints**

You can send written complaints about how we have handled personal information by email to [admin@aepl.org.au](mailto:admin@aepl.org.au) or by mail to the 'Privacy Officer', PO Box 530, Gordon NSW 2072.

Complaints will be reviewed by our Privacy Officer and a response will usually be provided within 30 days of receipt of the complaint.

If you believe that your complaint has not been satisfactorily addressed by us, after following the procedure set out above, you can make a complaint to the Office of the Information Commissioner (OAIC). The OAIC's contact details are [here](#).

## **9. Amendments**

We may amend this Privacy Policy at any time. Amendments to this Privacy Policy will be posted on our Website and will be effective when posted. Please check our Privacy Policy regularly for updates and amendments.

## **10. How Current is this Policy?**

This Privacy Policy was last updated on 10 October 2024.

## **11. Contact Us**

If you have any questions regarding this Privacy Policy or would like more information about the way we manage personal information, please contact us at [admin@aepl.org.au](mailto:admin@aepl.org.au). Alternatively, you may contact your local Study Centre:

Eremeran Hills Study Centre, contact [admin@eremeran.org.au](mailto:admin@eremeran.org.au)

Heathgrove Study Centre, contact [activities@heathgrove.org.au](mailto:activities@heathgrove.org.au)

Lowana Study Centre, contact [admin@lowana.org.au](mailto:admin@lowana.org.au)

Merindah Study Centre, contact [merindahstudycentre@gmail.com](mailto:merindahstudycentre@gmail.com)