

# Imparo Education Pty Ltd

## Website Privacy Policy

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### 1. INTRODUCTION

Imparo Education Pty Ltd (ACN 615 439 015) and its offices and branches ("**Imparo**", "**we**", "**our**" or "**us**") is an Australian based home and online tuition service.

Imparo is committed to ensuring that when we collect and use information provided to us from our clients, contractors, staff or visitors to our websites ("**visitors**", "**clients**", "**contractors**", "**you**", "**your**" or "**yours**") (as described below) we do so in accordance with applicable Australia data collection and privacy laws.

This Privacy Policy explains how we collect and use information, including personal or private information (as defined under applicable Australia data collection and privacy laws) that we obtain about you ("**personal information**"). For further information, please contact our privacy officer at [privacy@imparo.com.au](mailto:privacy@imparo.com.au).

### 2. SCOPE OF PRIVACY POLICY

This Privacy Policy applies to your use of any of our services, including when you request information from us or engage our tuition and other services, or as a result of your relationship with one or more of our clients or contractors, or to any information collected from third parties.

This Privacy Policy also applies to all our websites and online services, including the following:

- [www.imparo.com.au](http://www.imparo.com.au);
- social media platforms where we operate a user account, such as Facebook, LinkedIn and Instagram (subject to our Third Party Sites clause, below);
- our mobile apps; and

- any other website, mobile app or other online service created or hosted or operated by us from time to time on which this privacy policy appears, together, our "**online services**".

We may need to collect certain details from you through our online services if, for example, you want to subscribe to our publications, register to use an app or use our services, apply for a job or a contract role. In addition, our online services make use of cookies and similar technologies from time to time (as described below).

### **3. INFORMATION COLLECTION**

#### **General**

We may collect personal information directly from you, from clients or from our contractors. We may also collect personal information from third parties such as regulatory authorities or government agencies or other organisations with whom you have dealings, such as credit reporting agencies, recruitment agencies, information or service providers, publicly available records and the third parties described in the 'Disclosure of your information' section below. We will handle any unsolicited information in accordance with Australian or Victorian law, including destroying or de-identifying such information where we are required to do so by a relevant law.

We may collect current and historical personal information, including your name, date of birth, contact details, identification, organisation, employment, job title or positions held, demographic information, information about goods or services you have provided to or received from us, credit card or other banking & financial information and enquiry/complaint details.

We may also collect personal information about your other dealings with us and our clients, including any contact we have with you by telephone, email or online through while using the online services or social media platforms.

#### **Online Services**

When you use our online services, we may collect the following:

- Information you provide by completing forms (this includes information you give us when registering for any of our online services, subscribing to our services, submitting material or requesting further services);

- Information you provide to us if you contact us, including where you report a problem with our online services, raise a query or comment; and
- Details of visits made to our online services including, but not limited to, the volume of traffic received, logs (including, where available, the IP address and location of the device connecting to the online services and other technical information and identifiers about the device and the nature of the visit) and the resources accessed.

## **Careers and Recruitment**

- If you apply online for a job or work placement you may need to provide information about your education, employment and criminal history.
- Your application will constitute your express consent to our use of this information to assess your application and to allow us to carry out any monitoring activities which may be required of us under applicable law as an employer.
- We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions.
- We may exchange your personal information with academic institutions, recruiters, screening check providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. Without your personal information we may not be able to progress considering you for positions with us.

## **4. USE OF YOUR INFORMATION**

We use your information in order to provide you with, and improve, our services, for example:

- To ensure that content from our online services is presented in the most effective and secure manner for you and for your device and settings;
- To provide you, on an ongoing basis, with information and services, including education advice, that you request from us or which we feel may interest you as permitted under applicable law, and to measure the popularity and effectiveness of services such as newsletters and emails, in order to improve what we offer to you and other recipients;

- To maintain and develop our relationship with you;
- For research, planning, service development, security or risk management;
- To maintain and update our records;
- To carry out our obligations arising from any contracts entered into between you and us;
- To facilitate our internal business operations, including to fulfil our education requirements and professional obligations; and
- To allow you to use or access interactive features or secure areas of our websites, when you choose to do so.

We may not be able to do these things without your personal information. For example, we may not be able to provide our services to you.

Under applicable data protection legislation, we have a duty of care to ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information at [privacy@imparo.com.au](mailto:privacy@imparo.com.au).

## **5. DISCLOSURE OF YOUR INFORMATION**

We own the database rights in the information collected via our online services. We do not trade in or rent out this information.

As a national education practice, we may in providing our services and operating our business, allow our offices, branches and subsidiaries or our service providers to access your information.

In addition, we may exchange your personal information with third parties where:

- You have consented to us sharing your personal information in this way;
- We are under an education, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements) or in order to enforce or apply our business arrangements (or other client

terms) or to protect the rights and interests, property, or safety of Imparo Education, our clients or others;

- All, or substantially all the assets of an entity within Imparo Education are merged with or acquired by a third party, or we expand or re-organise our business, in which case your personal information may form part of the transferred or merged assets or we may need to transfer your information to new entities or third parties through which our business will be carried out;
- It is relevant in the circumstances to disclose the information to our clients, your employer or place of business, your professional advisers and parties with whom we have co-promotional arrangements (such as jointly sponsored events);
- We provide anonymous statistical information about users of our websites and related usage information to reputable third parties, including analytics and search engine providers; or
- We use a third party service provider to provide services that involve data processing, for example archival, auditing, reference checking, professional advisory (including education, accounting, financial and business consulting), mailing house, delivery, technology, website, research, banking, payment, client contact, data processing, insurance, forensic, litigation support, marketing and security services.

Some of the third parties with whom we share personal information may be located outside your country or the country from which the data were provided (collectively the "**jurisdiction of origin**"), including in the countries where Imparo Education has overseas offices or branches, or in any countries where a business that we have an association or alliance with has an office. While such third parties will often be subject to privacy and confidentiality obligations in that overseas jurisdiction, you accept that where lawful such obligations may differ from and be less stringent than the requirements of the privacy laws of the jurisdiction of origin. In that instance, we are not responsible for imposing the laws of the jurisdiction of origin, and you may not be able to seek redress under those laws.

## **6. SECURITY**

The transmission of information via the internet is not completely secure and we cannot guarantee the security of your data transmitted to our online services. You accept and agree that any transmission is at your own risk. Once we have received your information, we will take reasonable steps to

use procedures and security features to try to prevent unauthorised access, modification or disclosure. For example, electronic communications through non-secure web platforms may not be secure, virus-free or successfully delivered. If you communicate with us using a non-secure web platform, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

We take reasonable steps to hold information securely in electronic or physical form. We store information in access controlled premises or in electronic databases requiring logins and passwords. We require our third party data storage providers to comply with appropriate information security industry standards. All partners and staff and third party providers with access to confidential information are subject to confidentiality obligations.

You can help us to keep your information secure; please remember that any user name or password in relation to our websites is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

## **7. COOKIES**

Our online services use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and also to allow us to improve our online services.

## **8. THIRD PARTY SITES**

In addition to our online services, which we control directly, we also use and provide links to websites which are controlled by third parties, which may include:

Facebook, Twitter, LinkedIn and YouTube where we have certain Imparo Education accounts and profiles.

If you use or follow a link to any of these third party websites, please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you.

## **9. YOUR RIGHTS**

Some of our online services may give registered users the ability to directly access and update certain profile information.

If you would like to request a copy of your data or would like to change the information we hold about you, please contact us using the details below.

At any time if you would prefer to stop receiving newsletters and updates from us, please use the “unsubscribe” option included in the email or other material or you can contact us at [privacy@imparo.com.au](mailto:privacy@imparo.com.au).

## **10. STATUS OF THIS POLICY**

Your use of our online services or your provision of personal information to us constitutes your acceptance of the terms of this Privacy Policy.

Technologies and information governance practices are constantly developing. We may need to revise this Privacy Policy from time to time and you should be aware that we may amend this Privacy Policy in the future with changes, additions and deletions, at our discretion.

Your continued use of the Site following any amendments indicates that you accept the amendments. You should therefore review this page regularly to ensure that you are aware of any changes to its terms.

## **11. CONTACT AND FURTHER INFORMATION**

To find out more about Imparo Education, please visit [www.imparo.com.au](http://www.imparo.com.au).

If you have any questions about this Privacy Policy, or want to submit a written complaint about how we handle your personal information, please contact our Privacy Officer via [privacy@imparo.com.au](mailto:privacy@imparo.com.au).

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

## **12. IMPARO EDUCATION OFFICE LOCATIONS**

Imparo Education has a registered office at 33 Raynbird Place, Carseldine QLD 4034.

Last updated: 1 December 2016.