



Privacy Policy

This policy applies to the 'My Profiling' branded suite of software products as tools for vocational education and training, and all associated applications and services (**Software**), as provided by eLearning Australia Pty Ltd ACN 059 102 813 (**ELA**) and applies to anyone who accesses the Software (**you**).

ELA strives to ensure that any personal information you provide ELA with while using the Software is protected. Before interacting with the Software, please read this policy which sets out what information ELA collects from you and how it is used.

This policy forms the terms of an agreement with you which you accept and agree to by continuing to use the Software.

What information does ELA collect and hold?

ELA may collect and hold a variety of information from you while using the Software. This may include information which can be used to personally identify an individual (**Personal Information**).

Some types of Personal Information ELA may collect include:

- a. name;
- b. age and date of birth;
- c. e-mail address;
- d. street address;
- e. telephone number and other contact details;
- f. purchase and enquiry history with ELA;
- g. current employment details and vocational history;
- h. your qualifications;
- i. enrolment details with the private entity, educational institution or registered training organisation through which you are accessing the Software (**Organisation**);
- j. any Personal Information disclosed by you through data entered into the Software (**Client Data**) and
- k. any other information you disclose to ELA through interacting with the Software, ELA's support team or otherwise.

ELA may also collect and hold other types of information about your interaction with the Software.

How does ELA collect Personal Information?

How ELA collects and stores Personal Information depends on which components of the Software you use and how you choose to interact with the Software.

ELA generally collects Personal Information directly from you in the following ways:

- a. through your use of ELA's Software and websites;
- b. through communications between you and ELA's representatives or support team;
- c. through communications made between you and third parties through ELA's Software;
- d. whenever a subscription account is created with ELA;
- e. whenever you upload any Client Data; and
- f. whenever you participate in ELA's promotional offers or surveys.

ELA may also collect Personal Information from third parties such as:

- a. ELA's business partners and contractors, such as those who provide offers or services related to ELA;
- b. publicly available sources such as government websites;
- c. a government or industry body or Organisation; and
- d. poll or survey providers.

How does ELA hold Personal Information?

ELA stores Personal Information in electronic form on secure cloud based Amazon Web Services servers located in Australia. ELA does not store Personal Information or any other data collected from you, outside of Australia.

To further protect Personal Information you provide ELA with from mishandling, loss or unauthorised access, ELA:

- a. takes reasonable steps to ensure that ELA and ELA's third party data hosts conform with industry standard technical and organisational security measures;
- b. backs up its database automatically on a regular basis each day, with backups stored for a minimum of 12 months on multiple systems; and
- c. hosts its database and Software on separate systems to minimise system recovery times.

Stored Personal Information may be combined or linked with any other information about you that ELA holds, including any information ELA receives from third parties.

What does ELA use Personal Information for?

ELA collects, holds, uses and discloses Personal Information for the following purposes:

- a. to assess your identity and eligibility to use the Software;
- b. to provide the Software and any updates to the Software;
- c. to provide you with newsletters and information on offers, products and services offered by ELA or ELA's business partners;
- d. to provide support and communicate to you in relation to the Software;
- e. to manage your subscription with ELA;
- f. to conduct ELA's business operations;
- g. to process payments to or from you;
- h. to assess compliance with any agreement ELA has with you;
- i. to improve, develop and enhance ELA's Software and services;
- j. to provide information to government or industry bodies and Organisations;
- k. to promote ELA's products and those of third parties to you;
- l. to display content, certification requirements and training materials that are relevant to you;
- m. for ELA's marketing, planning, research, maintenance and administrative purposes or those of ELA's business partners;
- n. to provide to third parties where disclosed to you in this policy or otherwise where authorised by you;
- o. to investigate any complaint made by or against you or to investigate any unlawful or improper use of ELA's Software;
- p. as part of a transfer of ELA's assets should ELA propose or proceed to sell, merge, seek investment in or otherwise alter ownership of ELA or the Software;
- q. as otherwise required in connection with providing the Software; and
- r. as permitted or required by law.

Where appropriate, ELA attempts to de-identify and use Personal Information anonymously. However, ELA will disclose Personal Information without de-identifying it where requested by any government or industry body, regulator, educational institution or registered training organisation.

Other Information & Third Parties

Whilst you are using the Software, ELA, ELA's advertisers, business partners and other third parties may use various technologies to collect and hold information other than Personal Information. These technologies are used by ELA for various reasons including to:

- a. store your username and password for any subscription you have with ELA on a device;
- b. identify and track your IP address;
- c. collect and generate statistical, technical and descriptive information and reports about your use of the Software and the contents of Client Data (**Metadata**);
- d. understand your demographic, vocational history and location details;
- e. to combine information about your usage patterns with similar information obtained from other users to help improve ELA's Software; and
- f. to analyse statistical analysis of trends in industry, training and education or provide the information to third parties to do so; and
- g. to provide Metadata, via sale or otherwise, to third parties, provided the Metadata does not contain Personal Information which has not been de-identified.

Any content or site that is created or hosted by a third party, but is accessed by you via ELA's Software (through embedding, hyperlink or otherwise), may be subject to that third party's own privacy and data collection policies and practices which may vary from ELA's. ELA cannot control or take responsibility for the use of tracking or data collection technologies implemented by third parties.

If you voluntarily disclose Personal Information via a publicly accessible feature of ELA's Software, you do so at your own risk, as third parties may access and use this Personal Information to send you unsolicited material.

International Disclosure of Personal Information

ELA carries on its business operations from Australia. Any Personal Information you provide ELA with is disclosed to and stored on third party cloud based data hosting servers located in Australia.

Where international disclosure of Personal Information is necessary, ELA will take reasonable steps to ensure that overseas recipients handle your Personal Information in accordance with this policy and the *Privacy Act 1988* (Cth).

Accessing and updating your Personal Information

You have a right to request access to and seek correction of any Personal Information ELA holds about you. You can make this request via the contact details at the end of this policy or you can update your details via the Software.

Complaints

If you have any complaints, comments or concerns regarding this policy, please contact ELA directly via the details below. ELA will endeavour to get back to you as soon as possible, however please allow up to 30 days for ELA to respond before taking any other action.

Contact Details

For any queries in relation to this policy, please contact:

Privacy Officer
eLearning Australia Pty Ltd
2/40 Maud Street
Maroochydore Qld 4558
(07) 5326 3747
admin@my.edu.au

Updates

ELA may update this policy from time to time; the most current version of this policy will always apply.

Last updated: 23 March 2017