

Postgraduate School of Dentistry

Privacy Policy



1 About this Privacy Policy

- 1.1. This Privacy Policy describes how the Postgraduate School of Dentistry manages personal information of its current and prospective students and academic staff and how their data is processed by or on their behalf. It describes how we collect, hold, disclose and otherwise process personal information and the steps that we take to protect such personal information.
- 1.2. The Penn College owns and operates the Postgraduate School of Dentistry.
- 1.3. We are committed to complying with our privacy obligations in accordance with all applicable data protection laws, including the Australian Privacy Principles contained in Schedule 1 to the *Privacy Act 1988* (Cth).
- 1.4. If we decide to change this Privacy Policy, we will post the updated version on this webpage. Our policy is to be transparent about our privacy practices.

2 Provision of Educational Services

- 2.1. The Postgraduate School of Dentistry is an online post graduate educational institution that provides Australian Government accredited courses to postgraduates and practitioners in the dentistry industry.
- 2.2. In this privacy policy, we collectively refer to prospective and current students along with alumni as “students” and to our employees as “academic staff”.

3 The types of personal information we collect and hold about students and academic staff

- 3.1. We collect the following types of personal information:
 - (a) **Students:** Personal information that is provided to us during the student enrolment process and during any course attended by a student. The types of personal information collected include: copies of passport photo pages (the first page of the passport with the passport photo), drivers licences, full name, date of birth, gender, email address, telephone and mobile numbers, residential and postal address, country of birth, citizenship, employment status, details of work experience and qualifications achieved, ANZSO identifier, primary language spoken, disabilities, prior education and academic transcripts, unique student identifiers, enrolment and completion dates for courses undertaken, code and title of qualification, course or program enrolled in and completed, date certificates or statements of attainment are obtained, emergency contact details, credit card details and enrolment fee financing details (if a student chooses to finance their tuition fees via Ezy-Way).
 - (b) **Academic staff:** We collect some or all of the following information from our academic staff: names, genders, date of birth, address, email addresses, telephone and mobile numbers, education and academic transcripts, employment history, photos, skills and qualifications, certificates and accreditations, occupation, languages known, misconduct history, driver licence numbers, availability, specialisations and expertise, tutoring methods, national police checks and criminal history records, Tax File Numbers, bank account details, emergency contact details and superannuation details.
 - (c) **Information required for the support, maintenance and security of the Post Graduate School of Dentistry’s online learning platform:** In order to support and maintain our online learning platform, we collect and process student and academic staff information including IP addresses, email addresses, user access logs, usernames, passwords, information included by students and academic staff in technical support tickets and error messages.

4. How we collect personal information

- 4.1. We collect information about students and academic staff when they voluntarily disclose it to us or when we collect it about them when they use our online learning platform.
- 4.2. We collect personal information about students when they enrol in one of our courses by capturing the information in our online enrolment forms. After students enrol in one of our courses we collect further personal information about them in one or more of the following ways:
- (a) when personal information is entered into our online learning platform when they create an account or otherwise enter their personal information into our online learning platform;
 - (b) when it is voluntarily disclosed to us or our academic staff (such as via telephone, e-mail and online forms or in person).
- 4.3. We collect personal information about academic staff in one or more of the following ways:
- (a) when they apply to become an employee or contractor of the Postgraduate School of Dentistry;
 - (b) when personal information is entered into our online learning platform by them;
 - (c) when they otherwise disclose it to us in connection with their employment or engagement by us (such as, when providing us with doctor's certificates).

5. How we use personal information

- 5.1. Information about how we use personal information about students and academic staff is set out in the following table:

Category	How we use and process that personal information	Our reason for collecting the personal information
Personal information about students	<ul style="list-style-type: none">• To manage a student's enrolment with us and manage their participation in courses that they enrol in and compliance with the requirements of our Student Handbook;• To provide students with postgraduate courses (whether online or otherwise).• To provide technical and administrative support services to students.• Backing up and restoring data that includes student personal information.• To carry out security audits, investigate security incidents and implement security processes and procedures that require access to student personal information.• To produce internal reports for our own business purposes.• To handle complaints.	<ul style="list-style-type: none">• Performance of our contractual obligations to provide courses to our students.• Necessary for our legitimate interests (in order to operate our business including to allow students to operate our online learning platform, and to enable us to operate our IT systems and networks, manage our hosting environments and ensure the successful delivery of our services).• To comply with our legal and statutory obligations.• To collect certain information for national database and tracking purposes, to assist in ongoing qualification issuance as required and to contact and communicate with students during the period of a student's enrolment. The Enrolment Form collects information about a student, some of which is used by us during the period of enrolment (e.g. contact details and details

		about work experience and qualifications achieved) and some of which is collected to contribute to national records of VET activity (including reason for study, employment status and level of schooling).
Personal information about academic staff	<ul style="list-style-type: none"> • To recruit and manage the employment or engagement of academic staff. • To communicate with academic staff about the courses they are teaching and students they are teaching. • To handle complaints. 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (in order to operate and grow our business). • Compliance with our legal obligations.

6. Analytics data

- 6.1. We also collect information about our online learning platform users known as *analytics data* such as user location, information about devices accessing the platform, the amount of time a user spends on the platform and in which parts of it, and the path navigated through it. However, all such information is de-identified data and not collected in a form that could reasonably be expected to identify an individual. In any event, we only use analytics data for the following purposes:
- (a) to help us review, enhance and improve our online learning platform (for statistical or research purposes); and
 - (b) to develop case studies and marketing material without identifying any student or academic staff.

7. How we hold and secure personal information

- 7.1. We hold and store personal information that we collect in our offices, computer systems, and third party owned and operated hosting facilities. In particular:
- (a) we engage hosting facilities operated by reputable hosting providers;
 - (b) personal information that is provided to us via email is held on our servers or those of our cloud-based email providers;
 - (c) we use third party owned cloud-based customer relationship management (CRM) and marketing platform providers to hold personal information about current and prospective students who might subscribe to our online learning platform;
 - (d) personal information is held on computers and other electronic devices in our offices and at the premises of our personnel and academic staff; and
 - (e) we hold personal information that is provided to us in hard copy in files and folders in secure locations.
- 7.2. We take reasonable steps to protect personal information that we hold using such security safeguards as are reasonable in the circumstances to take against loss, unauthorised access, modification and disclosure and other misuse and to implement technical and organisational measures to ensure a level of protection appropriate to the risk of accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information transmitted, stored or otherwise processed by us.
- 7.3. For example, we:
- (a) only use reputable hosting providers to host personal information;
 - (b) implement passwords and access control procedures into our computer systems;
 - (c) perform security testing and maintain other electronic (e-security) measures for the purposes of securing personal information, such as passwords, anti-virus management and firewalls;
 - (d) maintain physical security measures in our buildings and offices such as door and window locks and visitor access management, cabinet locks, surveillance systems and alarms to ensure the

- security of information systems (electronic or otherwise);
- (e) require all of our employees, agents and contractors to comply with privacy and confidentiality provisions in their employment contracts and subcontractor agreements that we enter into with them;
- (f) have a Data Breach Response Plan in place; and
- (g) have data backup, archiving and disaster recovery processes in place.

8. Disclosure of personal information

8.1. We only disclose student and academic staff personal information that we collect as follows:

- (a) where specified in our Student Handbook (this requires disclosure of personal information to the National Statistical Database to comply with the total Vocational Education and Training (VET) activity reporting requirements for Registered Training Organisations (RTOs) and to the Australian Skills Quality Authority should the Postgraduate School of Dentistry cease to operate);
- (b) in order to host databases that are integrated into our online learning platform, we engage reputable hosting providers who host those databases on our behalf;
- (c) when performing contracts, we may outsource certain obligations to third party contractors in accordance with our contractual rights (such as hosting, software development and other professional services). Professional services carried out by them may require access to an individual's personal information. We ensure that all staff and contractors are aware of their information security responsibilities, are appropriately trained to meet those responsibilities and have entered into agreements which require them to comply with privacy and confidentiality obligations that apply to personal information that we provide to them;
- (d) when providing information to our legal, accounting or financial advisors/representatives or insurers, or to our debt collectors for debt collection purposes or when we need to obtain their advice, or where we require their representation in relation to a legal dispute;
- (e) where a person provides written consent to the disclosure of their personal information;
- (f) where it is brought to our attention that specific personal information needs to be disclosed to protect the safety or vital interests of any person;
- (g) to avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution, and punishment of offences;
- (h) for the enforcement of a law imposing a pecuniary penalty;
- (i) for the protection of public revenue;
- (j) for the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation); or
- (k) where required by law.

8.2. The director of the Postgraduate School of Dentistry has access to all records containing personal information by us.

9. Third party websites

9.1. Our online learning platform may include links to third party websites. Our linking to those websites does not mean that we endorse or recommend them. We do not warrant or represent that any third party website operator complies with applicable data protection laws. You should consider the privacy policies of any relevant third party website prior to sending personal information to them.

10. Interacting with us without disclosing personal information

10.1. Students and academic staff cannot use our online learning platform on an anonymous basis.

10.2. Any person has the option of not identifying themselves or using a pseudonym when contacting us to enquire about our postgraduate courses.

11. Offshore disclosure

11.1. All personal information that we collect is held in Australia.

12. How to access and correct personal information held by us

12.1. Students and academic staff who wish to access and correct the personal information held by us

about them should contact our Administrative Office.

- 12.2. Students and academic staff who have accounts on our online learning platform can access and correct personal information contained in their account, or delete their accounts, at any time, by logging into their accounts where such functionality is available or by contacting us. Once an account is deleted, we may still be required to retain the data in accordance with our data retention obligations. As a Registered Training Organisation, we are required to retain Australian Qualifications Framework certification documents for a period of 30 years, including sufficient records associated with student results and certificates of attainment so that any certificate can be reissued if required.
- 12.3. If we are contacted by any person who represents to us that they are a student or academic staff, for security purposes, we will only discuss the personal information that we hold about them with them if they identify themselves accurately and truthfully.
- 12.4. We will handle all requests for access to personal information in accordance with our statutory obligations. We may require payment of a reasonable fee by any person who requires access to their personal information that we hold, except where such a fee would be contrary to applicable law.

13. Our contact details

- 13.1. Any person who wishes to contact us for any reason regarding our privacy practices or the personal information that we hold about them, or make a privacy complaint, may contact us using the following details:

Privacy Representative and Data Protection Officer

info@pgdentalschool.edu.au

16 Transvaal Avenue, Double Bay NSW 2028

- 13.2. We will use our best endeavours to resolve any privacy complaint with the complainant within a reasonable time frame given the circumstances. This may include working with the complainant on a collaborative basis or otherwise resolving the complaint.
- 13.3. Complaints are handled in accordance with our Complaints and Appeals Policy & Procedure.
- 13.4. If the complainant is not satisfied with the outcome of a complaint or they wish to make a complaint about a breach of the Australian Privacy Principles, they may refer the complaint to the Office of the Australian Information Commissioner who can be contacted using the following details:

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Address: GPO Box 5218, Sydney NSW 2001