



## 1. INTRODUCTION

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- 1.1 The Women's College ("The College", "we", "us") is a residential college located in the St Lucia campus of the University of Queensland. The College exists to:
- (a) provide accommodation, food and associated amenities for female students of the Universities of Queensland, QUT and Griffith; and
  - (b) ensure all facilities are in place to provide a strong pastoral and academic supporting program to students' academic pursuits. ("**Services**")
- 1.2 In the course of our business in Queensland, we collect personal information.
- 1.3 The Women's College (being The Women's College Within the University of Queensland ABN 78 486 149 340) is committed to complying with the *Privacy Act 1988* (Cth) in relation to personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (APP's) that set out how organisations should handle personal information.
- 1.4 This Privacy Policy explains how we collect personal information and how we manage the information in terms of collection, storage, use and disclosure and is to be read subject to any overriding provisions of law or contract.
- 1.5 This privacy policy applies to any person about whom we currently hold, or may in the future collect, personal information.
- 1.6 This privacy policy also incorporates our policy on managing credit information (see clause 9)

### What is Personal Information

- 1.7 For the purposes of this Privacy Policy, "personal information" has the meaning given to it in the Privacy Act, being information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information or opinion is recorded in a material form or not. Examples of personal information include an individual's name, address, telephone number and date of birth.
- 1.8 Information is not personal information if it cannot be linked to an identifiable individual.
- 1.9 By continuing to correspond with us, using our website and by providing us with personal information, you are taken to have read and understood this Privacy Policy and you have consented to us managing your personal information as explained within this Privacy Policy.

## 2. HOW INFORMATION IS COLLECTED

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- 2.1 The College will generally collect personal information directly from the individual to the extent reasonably necessary to provide you with our Services.
- 2.2 Where an individual does not have capacity to consent to or provide personal information, a representative as detailed below can act on the individual's behalf;
- (a) a guardian/parent (Parent);



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- (b) someone with an enduring power of attorney;
- (c) a person recognised by other laws as a responsible person such as carer, family member; and
- (d) a person nominated in writing by the individual.

2.3 We may also collect personal information:

- (a) through the completion of forms by Parents or students;
- (b) online via The College's own website or the site the College runs in common with third parties (eg LiveUQ, UQ.edu.au);
- (c) meetings (in person or online) and interviews;
- (d) emails and telephone calls;
- (e) as a result of you making donations or submitting a report or feedback regarding a medical or other incident;
- (f) from student card details, passport, driver licence, Blue Card, Medicare card or private health insurance cards.

2.4 The College may also collect personal information about an individual from a third party, for example a report provided by a medical professional, a reference from another college or residential establishment, University of Queensland/ QUT or Griffith, Intercollege Council, UQ Sport, The Women's College Student Club, any other organisation with whom we deal.

2.5 Where we collect personal information from third parties you refer to us, we will assume, and you should ensure, that you have made that third party aware of the referral and the purposes of collection, use and disclosure of the relevant personal information.

## **Social Media**

2.6 We collect personal information from our followers and subscribers on social media channels including Facebook. The information is used for the purposes of developing and displaying the College's promotion materials. We have procedures in place to ensure that personal information collected from social media channels is handled in accordance with this Privacy Policy.

## **3. WHAT KINDS OF PERSONAL INFORMATION DOES THE COLLEGE COLLECT**

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3.1 The types of personal information The College collects from you will differ depending on how you interact with us. The type of information The College collects and holds includes (but is not limited to) personal information about:

- students and parents before, during and after the course of a student's enrolment at The College;
- students study information and job related information as residents or as Alumnae;

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- prospective employees;
- volunteers;
- contractors; and
- other people who come into contact with The College.

### **Personal Information (Parent)**

3.2 If you are a guardian or parent, we may hold and collect personal information about you which may include;

- (a) your full name and date of birth, personal contact details (including your home address, telephone numbers, e-mail address), credit information, credit card details, banking and financial information and any other personal information required to provide our Services to you or your daughter;

### **Personal Information (students)**

3.3 If you are a student, we may hold and collect personal information about you which may include;

- (a) your full name and date of birth, personal contact details (including your home address, telephone numbers, e-mail address, social network and video chat IDs and gender identification information) and sensitive information (see below);
- (b) contact and identification details of any third party that you have authorised to negotiate or provide your personal information on your behalf (including any authorised guardians or attorneys appointed by you under a power of attorney);
- (c) contact and identification details of your immediate family members, or nominated guardians or next-of-kin that we require for notification in the event of any emergency while you are at the College;
- (d) employment and education details and history;
- (e) financial and credit information; and
- (f) any other personal information required to provide services to you, process your application or any personal information relevant to your alumna engagement.

### **Personal Information (prospective employees, volunteers and contractors)**

3.4 If you are a prospective employee, volunteer or contractor, we may collect and hold personal information about you which may include;

- (a) sensitive information (see below);
- (b) contact information;
- (c) date of birth;

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- (d) employment arrangements and history;
- (e) insurance information and claims history;
- (f) licence details;
- (g) education details;
- (h) driving history;
- (i) banking details;
- (j) information required for security and screening purposes (for example, your vehicle registration); and
- (k) any other personal information required to engage you as a volunteer, contractor or to consider offering you employment.

#### **Sensitive information**

- 3.5 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.6 We may collect sensitive information from and about you necessary to provide you with our Services or engage you. This may include:
- (a) health information;
  - (b) racial or ethnic origins;
  - (c) religious beliefs or affiliations;
  - (d) membership of professional or trade associations or unions;
  - (e) criminal records;
  - (f) visa or residency status;
  - (g) any sensitive information required to be disclosed by law; and
  - (h) any other sensitive information required to perform Our Service to the individual.
- 3.7 We will not collect sensitive information without the relevant individual's consent unless permitted under the Privacy Act.

#### **4. ANONYMITY/PSEUDONYMITY**

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- 4.1 If it is lawful and practicable to do so, The College may offer individuals the opportunity of dealing with The College anonymously or by using a pseudonym. For example, when an individual makes a general inquiry about The College online or via phone.

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- 4.2 In some cases where you have chosen to use a pseudonym or remain anonymous, The College may not be able to provide the full extent of our Services to you, such as to enrol or continue the enrolment of the student, or permit the student to take part in a particular activity.
- 4.3 If you wish to use a pseudonym or remain anonymous you should notify us when making first enquiries with us.

## **5. ONLINE SPECIFIC CONSIDERATIONS**

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- 5.1 When you visit our website, we and/or our contractors may collect certain information about your visit. Examples of such information may include:

### **Cookies**

- 5.2 Cookies are small amounts of information which we may store on your computer (after you register on our website) to enable our server to collect certain information from your web browser. Cookies do not identify the individual user, just the computer used. Cookies and other similar technology make it easier for you to log on to and use the website during future visits (for example, they may maintain a shopping basket for your orders). They also allow us to monitor website traffic, to identify you when you visit our website, personalise website content for you, enable you to both carry out transactions and have access to information about your account. Cookies themselves only record which areas of the site have been visited by the computer in question, and for how long. Allowing us to create a cookie does not give us access to the rest of your computer and we do not use cookies to track your online activity once you leave our site. Cookies are read only by the server that placed them, and are unable to execute any code or virus.

### **Site visit information**

- 5.3 We also collect general information about your visit to our website. The information we collect is not used to personally identify you, but instead may include your server address, the date and time of your visit, the pages you accessed and the type of internet browser you use. This information is aggregated and used for the purposes of system administration, to prepare statistics on the use of our website and to improve our website's content.

### **Online payment systems**

- 5.4 We use third party payment process providers whose services meet stringent security requirements including Level 1 PCI DSS compliance, EMV certification and ISO 9002 accreditation. When you enter your payment details online, you are using a secure site which uses 1024 bite tunnelling encryption to protect your information during transmission. Transactions are protected by encryption technology and a combination of firewalls and intrusion detection systems.

### **Login information**

- 5.5 Some functions of the website and other online tools are subject to specific login credentials before access is granted. We may also collect personal information (including financial details, as mentioned above) to facilitate future visits or use of our website. We seek to keep current with available security encryption technology so as to maintain the effectiveness of our security systems.



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5.6 However, no transmission over the internet can be guaranteed as totally secure and accordingly, we cannot warrant or ensure the security of any information you provide to us over the internet. Please note that you transmit information at your own risk.

## **6. WHY DOES THE COLLEGE COLLECT, HOLD AND USE THE PERSONAL INFORMATION YOU PROVIDE?**

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6.1 We collect, use your personal information so that the College can carry out its functions and activities, provide you with the services you request, seek donations and, with permission, enable past students to be in contact with those from their year group or other years.

6.2 We may collect, use and disclose your personal information to:

- (a) respond to your requests or inquiries;
- (b) provide you with the services and information you requested. For example, accommodation, answer your queries about the College application processes, event hire and catering services or how to make donations to the College;
- (c) process your application as a resident or to use the facilities at the College, for example, for an event;
- (d) process your application to join any associations related to the College for example, student associations and Alumnae groups;
- (e) enable you to participate in College initiatives, activities and events;
- (f) manage communications with you during the course of your relationship with us;
- (g) notify you about important changes or developments to our functions, activities and services;
- (h) administer, support, improve and develop our College and services;
- (i) update and maintain our records, for example, student records and any administrative records;
- (j) if you lodge a complaint with us or an incident report, to process and respond to your complaint or report;
- (k) any other purpose which relates to or arises out of requests made by you;
- (l) do anything which you authorise or consent (actual or implied) to us doing; and
- (m) take any action we are required or authorised by law to take.

## **7. TO WHOM MAY WE DISCLOSE YOUR PERSONAL INFORMATION?**

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7.1 The College may disclose personal information to a range of third party organisations, depending on the dealings the individual has with us.



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- 7.2 The College may also approach some third party people or organisations to request information about students to The College. This is due to them providing a service to that student or it may be that services provided by these organisations impact their accommodation, pastoral or academic support within The College, for example;
- (a) The University & Faculty the student is attending;
  - (b) government departments;
  - (c) medical practitioners;
  - (d) visiting tutors, counsellors or sports coaches;
  - (e) Parents or Guardians;
  - (f) anyone you authorise (express or implied) the College to disclose information to;
  - (g) professional advisers and service providers who provide us with business, technology, marketing or operational advice;
  - (h) anyone to whom we are required to disclose the information to by law, for example, regulatory, government and law enforcement or state or federal health agencies.

### **Overseas Disclosure**

- 7.3 We generally do not disclose personal information outside of Australia, apart from:
- (a) in accordance with your instructions; and
  - (b) to the extent that your personal information is contained in emails that are filtered by our email filtering host McAfee that stores data on servers located overseas;
- 7.4 If your personal information is required to be disclosed overseas, we will notify you. We will take reasonable steps to ensure that our service providers are carefully chosen and have policies, procedures and systems in place to ensure your personal information is otherwise handled in accordance with the Privacy Act.

### **Marketing and fundraising**

- 7.5 The College seeks donations for the future growth and development of The College as an important part of ensuring that The College continues to provide a quality residential and caring environment in which both students and staff thrive.
- 7.6 Personal information held by The College may be disclosed to organisations that assist in the College's fundraising, for example Alumnae associations or, on occasions, external fundraising organisations.
- 7.7 Your personal information may be used for direct marketing and communications to provide you with information about services, events, campaigns, appeals and promotions. If you do not wish to receive such information, you can opt-out at any stage.
- 7.8 If you decide to opt-out, you will be removed from the College's marketing and or Alumnae database to ensure that you do not receive future direct marketing or communications material.



There may be times, however, when the law requires us to provide certain information to you (for example health, safety or compliance related information) and we will continue to do so.

- 7.9 We will not sell, trade or rent personal information we hold about you to unaffiliated third parties without your prior consent.

## **8. HOW DO WE HOLD AND MANAGE THE SECURITY OF PERSONAL INFORMATION WE COLLECT?**

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- 8.1 We mostly hold personal information electronically in our IT systems, secure servers and databases. We also hold personal information in physical form. The College has taken steps including but not limited to those detailed below to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification or disclosure.
- 8.2 The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.
- 8.3 The College follows the below steps to protect non electronic personal information:
- (a) securing the personal information in locked cabinets with restricted access;
  - (b) secure shredding and securing disposal once it has been used; and
  - (c) processing of payments promptly on receiving information.
- 8.4 The College follows the below steps to protect electronic personal information:
- (a) restricting access to records to authorised persons;
  - (b) maintaining an audit trail of staff interactions with student personal information where data is added to or changed;
  - (c) security certificates and industry standard security protocols for online information submissions in addition to secure industry standard e-commerce gateways;
  - (d) monitoring for unauthorised access to data;
  - (e) regular back-ups of critical data sources both online and in-house;
  - (f) use of reputable online and offline applications; and
  - (g) use of spam, phishing and other filters to restrict unauthorised access to data from outside the organisation.

## **9. HOW DO WE MANAGE YOUR CREDIT INFORMATION?**

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- 9.1 We do not use your personal information to assess your credit eligibility. However, during the course of providing our services to you, we may collect credit information that is necessary to provide you with our Services.



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### **What kinds of credit information may we collect?**

- 9.2 The main kind of credit information we collect is your identification information such as your full name, date of birth, address and drivers licence.
- 9.3 However, in the course of providing our Services, we may be given (and subsequently hold) the following other kinds of credit information:
- (a) information about any credit that has been provided to you;
  - (b) your repayment history;
  - (c) information about your overdue payments;
  - (d) if terms and conditions of your credit arrangements are varied;
  - (e) if any court proceedings are initiated against you in relation to your credit activities;
  - (f) information about any bankruptcy or debt agreements involving you;
  - (g) any publicly available information about your credit worthiness; and
  - (h) any information about you where you may have fraudulently or otherwise committed a serious credit infringement.
- 9.4 We do not collect your credit information from credit reporting bodies unless it is necessary to provide you with our Services or you have expressly asked us to.
- 9.5 We may collect personal information that may affect your credit worthiness from other credit providers, who have collected that information from a credit reporting body. The kinds of personal information we collect may include any of those kinds of personal information outlined in the section 3 of this policy.

### **How and when do we collect credit information?**

- 9.6 In most cases, we will only collect credit information about you if you disclose it to us and it is relevant in providing you with our Services.
- 9.7 Other sources we may collect the credit information from include:
- (a) banks and other credit providers;
  - (b) other individuals and entities via referrals;
  - (c) government bodies; and
  - (d) your suppliers and creditors.
- 9.8 However, in most cases you will be aware that this information is being collected as part of the Services we are providing to you.

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### **How do we store and hold the credit information?**

9.9 We store and hold credit information in the same manner as outlined in the 'How do we hold and manage your personal information' section of this policy.

### **Why do we collect the credit information?**

9.10 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with our Services.

9.11 We may also collect credit information to process payments.

### **Overseas disclosure of the credit information**

9.12 We will not disclose your credit information to overseas entities unless you expressly advise us to, apart from:

- (a) to the extent that your personal information is contained in emails that are filtered by our email filtering host McAfee that store data on servers located overseas; or
- (b) to the extent that it is necessary or desirable to make such a disclosure to obtain payment of money owed to us.

### **How can I access my credit information, correct errors or make a complaint?**

9.13 You can access and correct your credit information or complain about a breach of your privacy in the same manner as set out below.

## **10. HOW TO MAKE COMPLAINTS OR ACCESS AND CORRECT YOUR PERSONAL AND CREDIT INFORMATION**

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10.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

### **Access and correction of personal information**

10.2 An individual has the right to request access to any personal information which The College holds about them and ask for any inaccuracies to be addressed.

10.3 To make a request to access or update any personal information please contact the College in writing (see contact details below). The College will require you to verify your identity and specify the information you are requesting access to. The College cannot give you information about anyone else.

10.4 Making a request is free. However, the College may charge a small fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. The fee will not be excessive, and you will be advised in advance.

10.5 We will allow access or make the changes requested as soon as possible, subject to the request circumstances, unless we consider the Privacy Act or another relevant law requires us to withhold the information, or not make the changes. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

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- 10.6 The College respects every Parent's right to make decisions concerning their daughter's education and living arrangements. Generally, The College will refer any requests for consent and notices in relation to the personal information of a student to their Parents where that student is under 18 years old. During the period where a student is under 18, The College will treat consent given by Parents as consent given on behalf of the student, and notice to Parents will act as notice given to the student. Once a student is 18 or over, the requests for consent and notices regarding their personal information are directed to the student. It is noted that students and their parents will have the option to determine the most suitable request consent path either at the start of their residency and/or when they reach 18.
- 10.7 Parents may seek access to personal information held by the College about them or their child by contacting the College (see details below).
- 10.8 There will be occasions when we deny access to personal information. Such occasions may include where;
- (a) the request is unreasonable;
  - (b) the release of the information would have an unreasonable impact on the privacy of others;
  - (c) the release may result in a breach of the College's duty of care to the student;
  - (d) providing access would pose a serious and imminent threat to the life or health of any person; or
  - (e) there are other legal grounds to deny the request.

### **Complaints**

- 10.9 You can make a complaint about an interference with your privacy or our decision to refuse you access to personal information, by following the complaint procedures below;
- (a) The complaint must first be made to us in writing using the contact details in this section. The College will investigate any complaint and respond to you as soon as we can. If this is not possible, we will contact you and let you know when we will respond to your complaint. We will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.
  - (b) If the privacy issues cannot be resolved or you are not satisfied with our response to your complaint you can refer your complaint to the Office of the Australian Information Commissioner.

### **Who to contact?**

- 10.10 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

**Privacy Officer:** Helen Spurgeon

**Postal Address:** The Women's College, College Rd, St Lucia QLD 4067

**Telephone number:** 07 3370 4500

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**Email:** h.spurgeon@womens.uq.edu.au

10.11 The College's website will contain links to other websites over which The College has no control. As such, this privacy policy does not apply. Please review the policy in place by those websites and website owners before using those websites.

## **11. CHANGES TO THIS PRIVACY POLICY**

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11.1 The College may, from time to time, review and update this Privacy Policy to accommodate the requirements of new laws and technology, changes to the College's operational practices and to make sure it remains appropriate.

11.2 Any changes to our privacy policy will be published on our website.

11.3 This policy is effective from July 2018. If you would like further information about the way the College manages the personal information it holds please contact our Privacy Officer using the contact details in section 9 of this policy.

<b>What</b>	<b>Details</b>	<b>Date</b>
Document Management	Engagement and Marketing Manager	
Approval	Council of The Women's College	
Updated	Update to version 1.....	