

SGA Student Privacy Policy

1. Purpose

Study Group Australia Pty Limited (SGA) is committed to protecting and managing personal information lawfully and fairly.

This Policy outlines how we collect, hold, use and disclose personal information about students when performing our functions and activities.

2. Scope

This Policy applies to personal information about intending, current or past SGA students. This Policy applies to personal information collected by any method (including hardcopy, electronic or verbal means) and is to be implemented by SGA staff and Affiliates.

The Policy should be read in conjunction with the SGA and USPP privacy policies listed in section 11 of this Policy.

3. Policy Principles

SGA will comply with the legal requirements of relevant Australian privacy laws, and the European Union General Data Protection Regulation [2016/679](#) (GDPR) to the extent it applies to our activities.

SGA will support its Australian university partners in complying with their legal requirements under Australian privacy and information management legislation.

SGA staff and Affiliates will have authorised access to student personal information only where they have a genuine need to do so.

SGA will require any person or organisation to whom personal information is disclosed as described in this Policy and its Procedures to respect the security of your personal information and not use or disclose the information for a purpose other than the purpose for which the information was supplied to them.

4. Procedures

4.1 Types of personal information collected by SGA

Depending on the nature of our dealings with you, SGA may collect and hold various types of personal information about you, including:

- Identity and contact information
- Sensitive information, such as health information and information about your ethnic origin
- Government identifier information, including your passport number and tax file number
- Background checks, including information about your creditworthiness, past education and employment history
- Information about the education and other services provided to you by or through SGA
- Information about your use of SGA IT systems and services.

4.2 How SGA collects and holds personal information

SGA may collect and hold personal information about you in the following ways:

- Information you give us. You or your authorised representatives may give SGA information about you by filling in forms or by corresponding with us by phone, email, online or otherwise. Students are asked to supply information to SGA when applying for enrolment, at orientation sessions and during periods of study. This includes information that you provide when you

register to use our websites, subscribe to our services, and when you report technical or access problems. SGA will also collect information regarding payment of fees.

- Information we collect about you. We collect information about you when you use SGA's IT systems or visit our website. When you visit a College campus, we may collect personal information through clearly visible CCTV cameras.
- Information we receive from other sources. We collect information from marketing companies, Education Agents and other third parties involved in the student application process (for example, who assess creditworthiness), and from student accommodation and caregiving providers and your sponsor (if applicable).

SGA will store securely all records containing personal information. SGA will take all reasonable security measures to protect personal information from accidental or unauthorised access, use, alteration or disclosure.

4.3 Purposes for which SGA collects, holds, uses and discloses personal information

SGA will collect, hold, use and disclose your personal information for the following purposes. To:

- confirm your identity and contact details
- assess your application for admission and complete background checks, including information about your financial status, past education and employment history
- communicate with you and your authorised representatives, including your Education Agent, nominated parent, legal guardian, emergency contact, accommodation provider and caregiver provider (or suitable care giver relative) where applicable
- provide you with education, learning, welfare support and student services
- administer internships, insurance and other third party services
- administer scholarships and sponsorships where applicable
- manage your progression to university
- respond to your requests and enquiries
- investigate complaints or alleged misconduct
- market our services
- conduct business administration and debt collection,
- conduct data analysis and improve the student experience
- meet SGA's obligations under Australian law, including the Education Services for Overseas Students Act 2000.

SGA may use your personal information for purposes directly related to the purpose for which it was collected, or with your consent, for other purposes.

If you choose not to provide personal information to SGA, you may not be able to enrol to study with SGA or to receive other services from or through us.

4.4 Direct marketing

SGA may use your personal information so that we, Study Group, our business partners and third party service providers can market goods, services and special offers that we think will be of interest to you. We may contact you by email, text, through an SGA website or through social media. You can opt out of direct marketing by clicking the unsubscribe link included in the footer of our messages. To opt out of all direct marketing, please contact the ANZ Compliance team at anzcompliance@studygroup.com.

4.5 Disclosure of Personal Information

SGA will not disclose a student's personal information to another person or organisation unless:

- the student is reasonably likely to have been aware, or made aware that information of that kind is usually passed to that person or organisation
- the student has given written consent to the disclosure
- SGA believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the student or of another person

- the disclosure is required or authorised by law, or
- the disclosure is reasonably necessary for the enforcement of a law.

SGA provides the following supplementary information about disclosure of personal information:

SGA and Study Group are an international group of education provider companies. Study Group has centralised business functions in several locations worldwide. SGA will share your personal information (including sensitive information) within Study Group for the purpose of providing our services to you.

If you use an Education Agent to assist with your application, SGA may disclose your personal information to that Education Agent for business administration and Education Agent compliance monitoring purposes, before, during and after commencement of studies.

SGA has regulatory reporting responsibilities and will disclose students' personal information to the Commonwealth Government and to state and territory agencies, as required by Australian law.

If you are under the age of 18, SGA may disclose your personal information to your parent or legal guardian.

If you ask SGA to apply for Overseas Student Health Cover (OSHC) for you through its preferred insurer, or to obtain an OSHC refund for you, SGA will disclose your personal information (including sensitive information) to the insurer as reasonably required to process your application or refund.

If you apply for enrolment in a course that SGA delivers in partnership with an Australian University, SGA is collecting your personal information (including sensitive information) on behalf of that University and will disclose it to the University. Personal information collected on behalf of a university is required to be provided by SGA to the university, before, during and after commencement of studies.

In addition to the above, SGA and the University of Sydney own a joint venture company called The University of Sydney Foundation Program Pty Limited (USFP). SGA operates the University of Sydney Preparation Programs (USPPs) on behalf of USFP. If you apply for enrolment in one of the USPPs, SGA will be required to disclose your personal information to USFP for business administration purposes.

4.6 Cross-border disclosures

Your personal information may be disclosed, stored, processed or used outside of Australia by SGA, Study Group or our third party service providers (including cloud computing service providers). Before SGA discloses personal information to an overseas recipient, it will take reasonable steps to ensure that the overseas recipient will protect the security of that information.

SGA and Study Group have relationships with Education Agents in multiple overseas locations. As noted in section 4.5, if you use an Education Agent to assist with your application, SGA may disclose your personal information to that Education Agent.

As well as within Australia, we may transfer the personal information we collect about you to the following regions and countries in order to perform our services to you:

- New Zealand
- United Kingdom
- European Union
- USA
- Canada
- China
- Malaysia
- Singapore
- Indonesia

- Dubai
- Hong Kong
- India
- South Korea
- Taiwan
- Thailand
- Vietnam.

5. Right to access and correct personal information

Under certain circumstances, you have the following rights under privacy laws in relation to your personal information:

- Request access to your personal information. This enables you to receive a copy of the personal information SGA holds about you. SGA may charge a fee to cover our reasonable costs of locating and providing your personal information.
- Request correction of the personal information that SGA holds about you. This enables you to have any incomplete, misleading or inaccurate information SGA holds about you corrected, unless there is a law that requires us not to. SGA may need to verify the accuracy of the new information you provide to us.

If you wish to use either of the rights set out above, please contact the ANZ Compliance team at anzcompliance@studygroup.com. If SGA refuses to give you access to, or correct, your personal information, SGA will notify you in writing and set out the reasons.

6. Publication

The Policy will be made available to intending, current, intending and past students by publication on SGA's websites. Students give informed consent for their personal information to be collected, held, used and disclosed as set out in this Policy when accepting the SGA enrolment terms and conditions. SGA may update this Policy from time to time.

7. Complaints

Please contact SGA in the first instance and provide us with details of the complaint, and a proposal for how you would like us to resolve the complaint. The ANZ Compliance team will normally:

- acknowledge receipt of your complaint within five business days, and
- complete an investigation and respond to your complaint within 30 days.

SGA will determine what (if any) action SGA should take to resolve the complaint. If the matter is complex and the investigation will take longer, the ANZ Compliance Team will contact you with an estimated response time.

You also have the right to make a complaint about a breach of privacy to the Office of the Australian Information Commissioner (www.oaic.gov.au or telephone 1300 363 992).

8. Compliance

Staff and Affiliates are required to report any breach of this Policy to their manager immediately. If staff or Affiliates breach this Policy, SGA may take disciplinary action or legal action, up to and including termination of employment or other contractual relationship.

9. Records management and information security

SGA will take all reasonable steps to ensure any personal information collected is relevant to the purpose for which it was collected, is accurate, up-to-date, complete and not misleading.

SGA retains your personal information for as long as is necessary for us to comply with our legal obligations and perform our contracts with you. Personal information that is no longer required will be destroyed by following the provisions of the SGA Records Management Policy and Procedures.

Records in association with this Policy will be kept securely in accordance with the SGA Records Management Policy and Procedures.

SGA will comply with the requirements of the notifiable data breaches scheme in the *Privacy Act 1988* (Cth) where we experience, or suspect the occurrence of, an eligible data breach.

10. Definitions

The following definitions are used in this Policy:

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| Affiliates | Consultants and contractors to SGA, members of the SGA Board and Board Committees, members of College committees and any other persons or third parties appointed or engaged by SGA to perform duties or functions on its behalf. |
| College | Each of ANU College and Taylors College Sydney. |
| Education Agent | A person or organisation (within or outside Australia) who recruits overseas students and refers them to education providers. |
| Eligible data breach | An 'Eligible Data Breach' as defined in the <i>Privacy Act 1988</i> (Cth). |
| Personal information | 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 is recorded or not. It does not include anonymous information where the identity has been removed. |
| Sensitive information | Personal information about an individual's: <ul style="list-style-type: none"> • racial or ethnic origin • political opinions • membership of a political association • religious beliefs or affiliations • philosophical beliefs • membership of a professional or trade association/union • sexual orientation or practices, • criminal record, or • health, genetic or biometric information. |
| SGA | Study Group Australia Pty Limited, Level 1, 63 Oxford Street, Darlinghurst, NSW 2010. |
| Student | For the purposes of this Policy, a person who is an intending, current or past SGA student. |
| Study Group | For the purposes of this Policy, SGA's related bodies corporate. |

11. Related documents

The following documents are related to this Policy:

- *Education Services for Overseas Students Act (ESOS) Act 2000* (Cth)
- *Education Services for Overseas Students Regulations 2019* (Cth)

- *Privacy Act 1988 (Cth)*
- General Data Protection Regulations
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code)
- SGA Records Management Policy and Procedures
- SGA Website Privacy Policy
- Tuition Protection Service
- USPP Student Privacy Policy.

12. Policy governance

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|------------------------|----------------------------|----------------------|-----------------|
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| Policy Owner(s) | Head of GQCR | | |
| Endorsed | Executive Team | Date Endorsed | 20 October 2021 |
| Approved | Managing Director, ANZ | Date Approved | 20 October 2021 |

13. Document History

| Commencing Date | Summary of Changes | Next Review Date |
|------------------------|---|-------------------------|
| 30 January 2017 | v2.1 Minor amendments approved | April 2020 |
| 15 September 2018 | v3.0 Review and amendment to maintain business and regulatory currency. | September 2023 |
| | v3.1 Administrative amendments to maintain business and regulatory currency effective from 1 December 2018. | |
| | v3.2 Administrative amendments to footer to maintain business currency effective from 8 February 2019. | |
| 21 October 2021 | v4.0 Revised for currency, alignment with USPP Student Privacy Policy and SG website privacy policy. | 21 October 2024 |