# The University of Queensland Union College
# Privacy Policy

## Introduction

The University of Queensland Union College (ABN 74150890046) (**Union College**) provides residential accommodation for students aged 17 years and over who are attending a tertiary institution in Brisbane, Queensland, Australia. In operating our business, we collect personal information. This Policy outlines the personal information that we may collect and how it is managed.

## Purpose

The primary purpose for collecting personal information is to operate our business. We value the privacy of individuals who engage with us and share the importance of maintaining the privacy of any individuals whose personal information is processed by us.

## Scope

This Privacy Policy outlines Union College's commitment to protecting the privacy, confidentiality and personal information of individuals with whom it interacts. It establishes the organisation's approach to the collection, use, storage, management and disclosure of personal information in the course of its operations and activities.

This policy applies to all employees, volunteers, contractors, representatives and other persons acting on behalf of Union College, and extends to all personal information collected or held by the organisation, regardless of the format in which it is maintained.

Personal information covered by this policy may include, but is not limited to, names, contact details, personal records, photographs, videos, audio recordings and other information that identifies, or could reasonably identify, an individual.

Union College is committed to managing personal information in accordance with applicable Commonwealth and Queensland privacy legislation.

In carrying out our work, we collect personal information of individuals who:

a) apply for accommodation,
b) take up an offer of accommodation (whether it proceeds or not),
c) enter a financial contract with us to pay accommodation fees,
d) are the nominated next of kin for a resident at Union College,
e) employed at Union College,
f) are the nominated next of kin for a worker employed at Union College,
g) undertake work at Union College as a contractor,
h) undertake duties as a volunteer,
i) resided at the college and are captured on our security camera's

j) provide information to us by contacting us through our website, by email or telephone, or who talk to us to find out more about our business and our services, make a general enquiry or apply or express an interest in working with us.

## Definitions

**Personal Information**: Personal information is information or an opinion about an individual, where that individual could be directly or indirectly identified from that information or opinion. Personal information may include, for example, the name, address, email address, birthday, or other financial information of individuals. Personal information also includes health information about a person, where that person could be identified from the information. For example, this may include dietary needs or medical conditions.

## Use of Personal Information

We collect personal information by different means – for example, within our accounting software and client relationship management software on secure servers or via questions on our website. How the information is collected and from where that information is collected governs how we use this information and how it stored. The use of personal information and any disclosure of the information is set out below.

| Category | What type of information may be collected, and how? | How do we use it and specific disclosures? |
|---|---|---|
| **A. Clients**<br><br>If you are a resident of Union College, are next-of-kin for a resident of Union College, or financially support a resident at Union College, we will collect your personal information including security video footage. | Residents - we will collect your name, contact details, dietary requirements, medical information, age, gender, and other information, including your academic enrolment and performance.<br><br>Next of kin or provider of financial support - we will collect your name, contact details, bank account/payment details.<br><br>This personal information will be collected when you give it to us.<br><br>Security camera footage of the campus is collected continuously. | Residents - we use this information to:<br>• Communicate with you regarding the provision of our services,<br>• Support you to access our services, including academic and tutorial programs,<br>• Monitor the use of our services to understand their use, provide ongoing support to our clients, research, development, and improvement of our services, and protect our intellectual property, and<br>• Market our events to keep you informed of our activities.<br>• Footage is used to keep the campus safe and secure and to assist in incident investigations.<br><br>Next of kin or provider of financial support – we will use this information to:<br>• Contact you in relation to the resident, and/or<br>• Coordinate payment of fees. |
| **B. Contractor organisations**<br><br>Individuals working for organisations who work with us to support our business and operations | If you work for one of our contractors, service providers or collaborators, we may collect your name and contact details and other information relevant to working with us, which could include financial information for credit purposes or other matters. | We use this information to work with you, including in relation to administration matters (for example, invoicing), development and delivery of our service and other matters associated with working with you.<br>We may use this information to contact you to provide updates or information about us and our services. |

| Category | What type of information may be collected, and how? | How do we use it and specific disclosures? |
|---|---|---|
| **C. Individuals**<br><br>Who contact us. | We collect this information when you:<br>• contact us through our website, social media, email, or telephone,<br>• meet one of our team and provide them with your contact details,<br>• attend an event organised by us, and<br>• if you apply for a position with us. | We use this information to:<br>• respond to your enquiry,<br>• if you have applied for a job with us, to assess your application,<br>• to contact you to tell you about our events, services and provide news and information about our business. |

## General Disclosures

To support our operations, we use organisations who we trust and who agree confidentiality and privacy obligations with us. Your personal information may be disclosed to some of these organisations as part of our business operations. Examples include:

- contractors who work directly with us to provide our products and services, or
- cloud-based services which support our operations, for example, accounting software or client relationship management software used by us.

We will not sell personal information collected by us to any third party.

In limited circumstances, if required by law, we may disclose your personal information in accordance with that legal requirement.

## Media Consent and the Use of Photographs and Recordings

Union College respects the privacy of individuals and is committed to obtaining appropriate consent before using photographs, videos, audio recordings or other media in which an individual may be identified.

The organisation uses a Media Consent Agreement to seek and record an individual's permission for the collection, use and disclosure of their image, voice or other identifiable information for organisational, promotional, communication and marketing purposes.

## Access to your personal information

You may access the personal information we hold about you and update and/or correct it, subject to certain exceptions. If you wish to access your personal information, please contact us in writing.

The University of Queensland Union College will not charge any fee for your access request.

To protect your personal information, we may require identification from you before releasing the requested information.

## Maintaining the quality of your personal information

It is important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and, where necessary, up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## Updating our Privacy Policy

This Policy may change from time to time and is available on our website.

## Contact us about our Privacy Policy or your personal information

Contact us on unioncollege.unioncollegeuq.com.au if you would like:

- a copy of your personal information,
- to correct or amend the personal information we hold,
- have a question about our Privacy Policy, or
- have a complaint or concern regarding how we have handled your personal information.

## How to make a privacy complaint

If you believe we have breached applicable privacy laws, you can make a privacy complaint to us. Complaints can be made by contacting us using our contact details set out in section 9 of this policy.

We endeavor to respond to you within 2 business days to acknowledge your complaint and explain how we will investigate it. We will try to resolve your complaint within 30 days and write to you to explain the reasons for our decision. When this is not possible, we will contact you and let you know how long it will take for us to resolve your complaint.

If you are not happy with our response to your complaint, you can contact us to discuss your concerns or you can lodge a complaint with Office of the Australian Information Commissioner by visiting https://www.oaic.gov.au/privacy/privacy-complaints

## Our legal basis for processing your information

To collect, process, and share personal data for the purposes described in this Privacy Policy, we rely on a number of separate and overlapping legal bases, including:

- as necessary to perform or conclude any contract with you;
- as necessary for the legitimate interests of us or of a third party, provided those interests are not
- overridden by your interests or rights. We rely on our and others' legitimate interests in:
    - securing our website;
    - responding to any requests received through the website;
    - enforcing our terms;
    - where applicable, performing or concluding a contract with the organisation that you work for;
    - analysing how our website is being used and the effectiveness of our marketing and advertising campaigns and improving them;
    - monitoring access to our services to understand their suitability, provide ongoing support to residents, research, development and improvement of our services;
    - protecting our and others' intellectual and other property, interests and rights;
    - protecting us and others against error, fraud, damage and harmful or illegal activity;
    - sending and presenting tailored content to you;
    - complying with our legal obligations under Australian laws and responding to legal requests from governmental and law enforcement agencies; and
    - operating and expanding our business:

- as necessary to comply with our legal obligations;
- consistent with your consent. For example, where you have opted-in to receive direct marketing;
- communications about services or information we think may interest you or where you have consented to the use of non- essential cookies on our website;
- in limited cases, as necessary to protect the vital interests of you or of other users.

We may process personal data on more than one lawful ground depending on the specific purpose for which we are using that data. We only use personal data for the purposes for which we collected it unless we believe that we need to use that personal data for another reason that is compatible with the original purpose or as applicable law permits.

## Retention of your personal information

We retain your personal information for the period necessary to fulfil the purposes outlined in this privacy policy or such longer retention period as may be required or permitted by applicable law. For instance, we may keep your information to comply with our legal obligations, to resolve disputes, to enforce our agreements or as otherwise permitted by law.

The precise periods for which we keep your personal information vary depending on the nature of the information and why we need it. Factors we consider in determining these periods include the minimum required retention period prescribed by law or recommended as best practice, the period during which a claim can be made with respect to an agreement or other matter, whether the personal information has been aggregated, and other relevant criteria.

## Additional Rights

In addition to the rights set out in the main body of this Privacy Policy (i.e. your right to access your personal information and rectify any incorrect personal information we hold about you), you have certain other rights under the Australian data protection laws.

Please note that these rights are not absolute and are subject to certain exemptions under applicable data protection law.

As a data subject, you have the following rights:

- where we rely on our legitimate interest to use your personal data, you have a right to object to this use (in which case we will desist from processing your personal information unless we can demonstrate an overriding legitimate grounds for the continued processing of your personal information);
- the right to port your personal information in certain cases;
- the right to withdraw your consent at any time (though this does not impact on the lawfulness of what we did up based upon your consent until that point);

- the right to request us to restrict the use of, or stop using, your personal information in certain cases;
- the right to object to the use of your personal data for direct marketing;
- you may request that we delete the personal data which we hold about you where you withdraw your consent and in certain other cases.

## Review and continuous improvement

We will review this policy at least annually, and sooner if:

- Relevant laws or regulations change
- We identify issues in practice or through feedback that require updates.

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