Purpose

This Policy and Procedure is developed to ensure:

- compliance by U@MQ Ltd (U@MQ) and its employees and others with the Privacy Act 1988 (Cth);
- that appropriate systems are put in place and maintained to ensure ongoing compliance with the privacy laws.

This Policy and Procedure outlines U@MQ’s principles for protecting the privacy of personal and health information that it holds about its staff and students, and those who interact with U@MQ.

Overview

U@MQ is a controlled entity of Macquarie University and a company incorporated under the Corporations Act 2001 (Cth). It is responsible for managing the University’s childcare facilities, retail outlets on campus (such as the food and beverage facilities), the sport venues on and off campus (such as the Sport and Aquatic Centre), student organisations and student experience at the University in general. It operates under the name ‘Campus Life’.

It must comply with the Privacy Act 1988 (Cth), the Privacy and Personal Information Protection Act 1998 (NSW) and the Health Records Information and Privacy Act 2002 (NSW).

Amendments to the Privacy Act 1988, which come into effect from March 2014, require U@MQ to have its own privacy policy. To the extent that there is an inconsistency between the University Privacy Policy and Procedure and this Policy and Procedure as applicable to U@MQ, this Policy and Procedure shall prevail.

Scope

This Policy and Procedure applies to all employees of U@MQ and to any person who collects, holds or manages personal or health information for or on behalf of U@MQ, including contractors, agents, visitors, honorary appointees and consultants of U@MQ.

The Policy

DEFINITIONS

Australian Privacy Principle or APP means the principles set out in Schedule One of the Privacy Act 1988 (Cth).

Personal information has the meaning given in the Privacy Act 1988 (Cth).

Health information has the meaning given in the Privacy Act 1988 (Cth).

Sensitive information has the meaning given in the Privacy Act 1988 (Cth).
Information collected by U@MQ

U@MQ through its employees and authorised personnel collects and holds personal information about you such as your name, date of birth, contact details, next of kin and emergency contact details, tax file number, visa and/or passport details, health information (if required), bank account and/or credit card details, information about your educational history or work experience, current employer and academic records. Its children’s services may also collect sensitive information about the religious affiliation and racial or ethnic origin of its clients, where it is required to do so by law. U@MQ may also collect images from CCTV cameras installed on University land. U@MQ may, with your permission, also collect information about you from other government authorities or bodies.

How your information is held

Your information is mostly held in electronic format in U@MQ electronic databases. It may also be held in paper format.

Purposes for which your personal information is collected, held, used and disclosed

U@MQ collects, uses and discloses your personal and/or health information for several purposes including:

- to establish your identity and to process your application for a service operated by U@MQ (such as your membership at the Sport and Aquatic Centre, a student organisation or one of the children’s services);
- for the ongoing administration and provision of our services to you (such as the provision of educational programs at the childcare facilities, or programs offered at the Sport and Aquatic Centre);
- to provide student engagement activities (such as Orientation Week and MacFest);
- for employment purposes (including for contractors);
- to respond to your request for information from U@MQ; or
- for other purposes which are apparent from the request made by you.

Your information may also be shared with the University in order for the University to give you access to broader University services and facilities and to process your employment benefits and entitlements.

More detailed information about the way U@MQ uses and discloses your personal information is set out in the individual privacy collection notices provided when you use a particular service offered by U@MQ. For example, when you become a member of the Sport and Aquatic Centre or enrol in one of the programs at the Centre, or if you are a parent who is enrolling your child at one of the children’s services, you will be informed how your information will be used and disclosed in the relevant registration form.

The privacy collection notices applicable to the University (available at http://www.mq.edu.au/about_us/how_mq_works/privacy/collections_notices/) also apply to U@MQ as if U@MQ were substituted for the University in those notices. You can find out more information about how your personal and health information is used and disclosed by U@MQ in those privacy collection notices. We encourage you to take the time to review these
privacy collection notices.

**Direct marketing**

U@MQ may from time to time wish to contact you about the services we offer or upcoming events. When we send you these communications, you will be given the opportunity to ‘opt-out’ of receiving those communications by selecting the “opt-out” option. You may also opt-out of receiving those communications at any time by contacting the Marketing Manager on cl.marketing@mq.edu.au.

**Disclosure overseas**

Generally, U@MQ does not disclose personal or health information outside Australia. However, some of our service providers (such as our IT providers) operate overseas or use third party hosting arrangements that store data outside Australia or in the "cloud". When your information is sent overseas in these circumstances, it is likely to be in one of the following countries:

- United Kingdom
- United States
- Countries within the European Union.

Unless we obtain your consent or an exemption in the *Privacy Act 1988* (Cth) applies, when U@MQ sends your information overseas, we are required under the Privacy Act to take measures to ensure those overseas recipients treat your information in accordance with the Australian Privacy Principles.

**Security of your information**

U@MQ takes reasonable steps to ensure that the personal and health information it holds and discloses is managed and maintained securely by:

- using IT technologies which have security measures built into them;
- restricting access of staff and others to personal and health information stored within U@MQ;
- securing its websites and systems against unauthorised access;
- securing entry to buildings where information is stored; and
- ensuring that parties contracting with U@MQ are bound to comply with privacy and confidentiality provisions (where practicable and possible).

**Access to information and complaints**

You may write to us to request access to or correction of your personal and health information held by U@MQ (subject to any applicable laws) by contacting us directly, as detailed below. We will respond to your request within a reasonable time period and, subject to applicable legal considerations, grant you access to or arrange for the correction of your personal information, in a matter which is reasonable and practicable in the circumstances.

If you have a complaint about how your personal information is collected, held or disclosed by U@MQ or if you believe that we have breached an Australian Privacy Principle under the *Privacy Act 1988* (Cth) we ask that you contact us with your complaint in writing in the first instance to:
We endeavour to resolve all disputes promptly and fairly. If however, you are not satisfied with the outcome you receive and your complaint relates to the handling of your information by U@MQ, you may refer the complaint to the Office of the Australian Information Commissioner (OAIC). When we write to you about our decision, we will explain how you may make a complaint to the OAIC. Alternatively if your privacy complaint falls within the provisions of the Privacy and Personal Information Protection Act 1988 (NSW), you may request that it be dealt with in accordance with that Act. Further information is available under the Complaints section of the University Privacy Framework (available at http://www.mq.edu.au/about_us/how_mq_works/privacy/complaints/)

Responsibility for maintaining compliance with Australian Privacy Principles (effective from March 2014)

Staff, students and patrons of our services assist U@MQ to maintain accurate information by updating their details through online software systems, by contacting their HR contact (for staff) or the relevant service provider (such as the childcare centre or the Sports and Aquatic Centre).

Personnel responsible for maintaining compliance with Australian Privacy Principles from March 2014 at U@MQ are:

<table>
<thead>
<tr>
<th>Person Responsible</th>
<th>Responsibility</th>
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<tbody>
<tr>
<td>U@MQ Human Resources Manager</td>
<td>Employees and contractors of U@MQ receive appropriate privacy training upon commencement of their role with U@MQ.</td>
</tr>
<tr>
<td>U@MQ Infrastructure Support Manager</td>
<td>Security of IT databases, systems and U@MQ servers.</td>
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<tr>
<td>U@MQ Marketing Manager</td>
<td>All direct marketing communications meet the requirements of APP 7.</td>
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<tr>
<td>Members of the U@MQ Executive Team (as appropriate)</td>
<td>Contracts with third party providers contain appropriate privacy and confidentiality clauses (where practicable).</td>
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<tr>
<td><strong>Keywords</strong></td>
<td>Privacy, Personal, Confidentiality.</td>
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<tr>
<td><strong>Date Approved</strong></td>
<td>21 March 2014</td>
</tr>
<tr>
<td><strong>Signature</strong></td>
<td></td>
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<tr>
<td><strong>Approval Authority</strong></td>
<td>CEO of U@MQ Limited</td>
</tr>
<tr>
<td><strong>Date of Commencement</strong></td>
<td>1 April 2010, 21 March 2014</td>
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<tr>
<td><strong>Amendment Dates</strong></td>
<td>21 March 2014</td>
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<tr>
<td><strong>Date for Next Review</strong></td>
<td>21 March 2015</td>
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<tr>
<td><strong>Related Policies, Work Instructions, Forms or Manuals</strong></td>
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<tr>
<td><strong>Policies/Rules Superseded by this Policy</strong></td>
<td>N/A</td>
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