

Privacy Policy

Possibilities (ABN: 49 099 339 223) acknowledges and respects the privacy of individuals. This Policy explains how we collect, use, disclose, retain and manage your personal and sensitive information (Information) in the course of our business. Possibilities is committed to complying with the Privacy Act and the 13 Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act) and the Health Records Act and 11 Health Privacy Principles in the Health Records Act 2001 (Vic) (Health Records Act).

You are not obligated to provide your Information to us, however, if you do not provide us with the Information we require, or where Information provided is inaccurate or irrelevant, we may not be able to engage with you or may be limited in our ability to engage with you and provide you access to our services.

We reserve the right to make changes or updates to this policy from time to time. Should we do so, we will update the policy on our Websites accordingly. Consequently, please check our websites regularly to stay informed of any updates. Your continued engagement with Possibilities, including your use of the Possibilities Website (e.g. negotiationeducation.com.au), or the provision of further information to us after this policy has been revised, constitutes your acceptance of the revised policy and you consent to us collecting, holding, using, disclosing and managing your Information in the way described in this Privacy Policy or permitted under the Privacy Act.

If you do not agree with the practices described in this Privacy Policy, please do not provide us with your Information or interact with our Website.

Collection of your Information

Personal Information

Personal information is information or an opinion about an identified, or reasonably identifiable, individual.

Possibilities engages with various individuals, including but not limited to students, potential students, participants, faculty and general staff.

During the provision of Possibilities' services, the types of information that Possibilities collect will depend on the service requested by you. We will, in most cases, collect personal information directly from you through written and verbal communication. This includes when you submit job application, admission or other forms, participate in surveys, feedback, interviews and questionnaires, visit our Websites, enter into a competition or promotion or otherwise provide us with personal information in person or via telephone, email, fax, post or other means. Generally, the kinds of personal information Possibilities collects include:

- contact and identification details (e.g. name, addresses, email address and phone number);
- gender and date of birth;
- banking and payment details (e.g. credit card details, tax file numbers);
- information about your academic and educational results, details and history;
- information about your employment and vocational details and history (e.g. experiences, qualifications, skills, awards, remuneration, financial information, references, professional associations, career aspirations and employment availability);
- any results of relevant tests in which you participate, including but not limited to online testing carried out on Possibilities's behalf;
- information relevant to any training programs you undertake while participating in Possibilities programs or courses; or
- other information relevant in the circumstances.

Possibilities collects your personal information in various ways, including when you:

- visit our Websites (including any application managed by us);
- interact with our advertisements;
- apply for or participate in an Possibilities course or program;
- apply for or participate in the employment process;
- register for alumni services;
- interact or follow our social media pages/profiles;
- enter into a competition or promotion through any medium;
- participate in a survey or other market research activities; or
- request information from us or submit any feedback or query.

Privacy Policy

There may be other occasions when we collect your personal information from other sources such as education providers, government departments, internet service providers, employers, publicly maintained records, including records publicly available through social media, or other third parties. Generally, we will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you, or if those sources are authorised to do so.

Sensitive Information

Sensitive information is information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional/trade association or trade union, sexual preferences or practices, criminal record, and health or genetic information. We will not collect sensitive information unless you have consented or the collection is required under law or for the establishment, exercise or defence of a legal or equitable claim.

Possibilities collects certain health information including details of an individual's allergies, dietary requirements, medical conditions and medical history in order to ensure the safety and wellbeing of all Possibilities students and staff.

Passive Information

Each time you visit our Websites, our server passively collects certain information using various technologies such as cookies, internet tags, web beacons, and navigational data collection methods (log files, server logs, clickstream).

This passive information is collected for statistical and marketing purposes, and to help us improve our services. This information can include the type of browser and system you are using, whether you have interacted with any advertisements or links, the address of our websites you have come from and move to after your visit, the date and time of your visit and your server's Internet Protocol (IP) address.

You can set your browser to accept or reject all cookies, or to notify you whenever cookies are offered so that you can decide each time whether to accept them.

Should you reject all cookies, your ability to use our Websites may be limited as certain features may not function correctly.

Advertising cookies

Possibilities also uses advertising cookies to collect anonymous data, including visitor demographics and interests, as part of our implementation of the following Google Analytics Advertising Features: Remarketing with Google Analytics, DoubleClick Platform integrations and Google Analytics Demographics and Interest Reporting.

We and our third party vendors, such as Google, use first party cookies (such as the Google Analytics cookie) or other first party identifiers, and third party cookies (such as the DoubleClick cookie) or other third party identifiers together to optimise and serve advertisements to you across the internet on the Google Display Network and to analyse your interaction with advertisements.

Information on how to opt-out of the use of your information by **DoubleClick** can be found at <http://www.google.com/ads/preferences/?hl=en> and how to opt-out of Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

Privacy Policy

Use and Disclosure of Your Information

Use

We use your Information for the purposes for which it was provided to us, other related purposes and as permitted or required by law. Our primary purposes for collecting, holding, and using your personal information are for research, administration and education, and for other purposes for which you have specifically provided consent. Such purposes include, but are not limited to, the following:

- assessing your application (i.e. for admission or employment etc.);
- confirming your identity and establish next of kin (for emergencies);
- communicating with you;
- administering and facilitating the progression of a Possibilities course, from enquiry, application, registration, selection and admission through to completion, career/educational progression and alumni status;
- charging course (and other) fees, offer financial support (grants, scholarships etc.) and pay wages;
- managing the recruitment and ongoing management of associates and programs;
- creating and informing you of alumni events;
- providing career support services;
- conducting research investigations;
- collecting information relating to quality and compliance issues;
- satisfying any statutory legal obligations;
- informing you of future activities or events and to facilitate improvements to the services provided to you; and
- any other purposes where consent has been provided.

For any of the above purposes we may contact you by electronic or other means.

Personal information you provide is considered a company asset and may be included among transferred assets if we merge, combine or divest part of our business unless prohibited from doing so by law.

Our primary purpose for collecting, holding and using your health information is to ensure your health and safety during your employment at Possibilities, participation in an Possibilities course or other program, or use of Possibilities' facilities.

Disclosure

We disclose your Information for the same purposes for which we collect it. That is, generally, we will only disclose your personal information for a purpose related to research, education and administration, if we have obtained your consent, or otherwise as set out in this Policy. This may include disclosing your personal information to:

- Possibilities's insurers and professional advisors;
- Possibilities's contractors and suppliers, including IT contractors and database designers;
- any other third parties engaged to perform functions or activities on our behalf, including direct marketing;
- any other entity, with your consent, or to whom disclosure is required or authorised by law;
- any other third parties engaged to perform administrative or other services.

We may also disclose your health information to third parties including health service providers to ensure your health and safety during your employment at Possibilities, participation in a Possibilities Course.

This disclosure is done on a confidential basis or otherwise in accordance with law. You should note that third parties may collect, hold, use and disclose your Information in accordance with their own privacy policies and procedures and these may be different from our own.

Privacy Policy

Overseas Disclosure

We may disclose Information to overseas recipients for the same purposes for which we collect it. That is, for the purposes of research, administration, health and safety and education. Such disclosures are generally made to other universities or educational organisations around the world for the purpose of hosting our students as part of a student exchange or study abroad program. These recipients are located in People's Republic of China, United States of America, New Zealand & Canada but may also be located in other countries. Our contracts with these parties generally include an obligation for them to comply with an applicable law or binding scheme which effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles and the Health Privacy Principles.

We will take all reasonable steps necessary to ensure transferred Information is kept secure as required by applicable data privacy laws. However, you acknowledge that, by agreeing to the disclosure of your Information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the Australian privacy law in relation to your Information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients and, on this basis, you consent to such transfer, processing, storage and/or disclosure.

In circumstances where the provision of your Information to an overseas recipient may be deemed use rather than disclosure, we will instead comply with our use policy as outlined above.

Direct Marketing

We may collect, hold, use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting us via the contact details set out below or through any opt-out mechanism contained in a marketing communication to you.

Security

Possibilities stores and holds Information electronically and/or in hard copy. We will take reasonable steps to store and hold Information in a secure and restricted manner and to protect Information from misuse, loss and unauthorised access, modification or disclosure. Access to your Information is limited to those individuals who require such access in order to perform their duties and responsibilities. Any Information held by a third party storage provider is done so under a contractual obligation of confidentiality and non-disclosure.

While the Websites have secure password protections in place, you should be vigilant and note that there are inherent risks associated with transmitting Information via the internet. This means we cannot guarantee that data transmission will be 100% secure or safe from attack from unauthorised intruders and no data protection or security measure is completely secure, particularly in relation to online transmissions. You must take care to ensure you protect your Information (for example, by protecting your usernames and passwords) and you must notify us as soon as possible after you become aware of any security breaches.

Your Information, where not stored electronically, is stored in our secure office premises with restricted access or with an offsite secure storage facility. If we no longer require the use of your Information, we will take reasonable steps to destroy or permanently de-identify it.

Access and Accuracy of Your Information

We will take reasonable steps to ensure that the Information we collect is accurate, up to date and complete.

You have a right to access, and request the correction of, any of your Information at any time. You may also request that we delete your Information at any time. Any such requests should be made directly by contacting us at the details set out below. Possibilities will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct Information where necessary and appropriate. There may be circumstances in which we cannot provide you with access. We will advise you of the reasons if we deny you access.

Privacy Policy

Third Party Links

The Websites may contain links to other websites of third parties. A link to a third party website is not an endorsement of the accuracy or trustworthiness of that website or its content and any information collected by such websites will be subject to that website's privacy policy. We cannot and do not assume any responsibility for the privacy or security practices of any other websites that you may be able to access through our Websites.

Our Websites and/or any electronic methods of communication, including without limitation social media, may be accessible through or contain connections to areas where you may be able to publicly post information, communicate with others, review products and submit media content. Prior to posting in these areas please read our Terms and Conditions and this Privacy Policy set out on our Websites carefully. All the information you post may be accessible to anyone with Internet access and any Information you include in your posting may be read, collected and used by others.

Consent

You consent to us, our agents, contractors, authorised employees and any related party collecting, holding, using, disclosing and managing your Information in accordance with this Privacy Policy for the purposes contemplated herein.

How to stop receiving communication from us

To remove your details from any of our marketing and communication databases simply email admin@allpossibilities.com.au.

How to contact us

If you have any queries or wish to make a complaint about a breach of this policy, the Privacy Act or Health Records Act, you can contact or lodge a complaint to the directors of Possibilities using the contact details below. You will need to provide sufficient details regarding your complaint as well as any supporting evidence and/or information.

The directors will respond to your query or if a complaint has been made investigate your complaint and determine the steps that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing (which includes electronic communication via email or fax) of the relevant determination. If you are not satisfied with the determination, you can contact us to discuss your concerns or complain to the **Australian Privacy Commissioner** via www.oaic.gov.au.

The Directors

Possibilities Pty Ltd

P.O. Box 230 | McCrae, Victoria | 3938