Privacy Policy

Breakthru (ABN:18 097 919 607) and its related bodies or entities (we, our, us) respects your right to privacy and is committed to safeguarding the privacy of our customers, carers, and website visitors. We adhere to the Australian Privacy Principles contained in the *Privacy Act* 1988 (Cth). This policy sets out how we collect and treat your personal information.

Collection of personal information

Breakthru will, from time to time, receive and store personal information you enter onto our website, provided to us directly or given to us in other forms.

The type of information we collect will depend on the nature of your interaction with Breakthru, however Breakthru may collect the following types of information:

- Identification and contact details, such as name, mailing and/or street address, email address, telephone number, age or birth date.
- Family type, country of birth, year of arrival in Australia, language spoken at home.
- Financial information, such as housing, occupation, financial status and income.
- Sensitive information, such as racial or ethnic background, criminal history and health information, English proficiency, need for an interpreter or disability.
- Other personal or sensitive information not covered above which is collected as a result of providing a customer with a product or service.
- Details of the services a customer has requested or enquired about, or services provided, together with any additional information necessary to respond or deliver those services.
- Any additional information relating to a customer that a customer provides in-person, by telephone, in writing or via email.
- Information you provide to us through customer surveys or visits by representatives from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

How we collect your personal information

Breakthru collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we provide services to you. We may also receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

Notification of collection of personal information

When Breakthru collects personal information, or as soon as possible after collection, we will provide customers with a privacy notice (otherwise known as a collection notice) and/or refer customers to this Privacy Policy.

What happens if Breakthru can’t collect personal information

Due to the nature of the products and services provided by Breakthru, generally, it is not possible to provide services or deal with customers in an anonymous way. For example, if a customer does not provide Breakthru with personal information described above Breakthru may not be able to provide services to you, or to provide you with information about services.

For what purpose does Breakthru collect, hold, use and disclose personal information

Breakthru collects, holds, uses and discloses personal information for the following purposes:

- To assess whether a customer is eligible for services.
- To provide a range of products and services to customers.

- To contact you by a variety of measures – telephone, email, SMS or mail.
- To answer enquiries and provide information about Breakthru products and services.
- To recruit staff, contractors and volunteers.
- To update our records and keep customer contact information up to date.
- For planning, quality control and for the creation of anonymous case studies.
- To update records.
- For use in monitoring and assessing Breakthru services, including as part of peer review of service and reporting to funding providers.
- To provide updated personal information to our related contractors or service providers.
- To process and respond to any complaints.
- To comply with any law, rule, regulation, lawful and binding determination.
- To assess the performance of our website and to improve operations of the website.
- For the administrative, marketing (including direct marketing), planning, produce or service development, quality control, and research purposes of Breakthru, its related bodies, contractors or service providers.

Breakthru may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law for which the customer has provided their consent.

Customer's personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

Privacy and your enrolment information

Why we collect your personal information

As a registered training organisation, we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us. Failure to provide your personal information may result in us not being able to enrol you in our VET courses.

How we use your personal information

Breakthru uses your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO.

How we disclose your personal information

We are required by law (under the National Vocational Education and Training Regulator Act 2011 (Cth) (NVETR Act) to disclose the personal information we collect about you to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER). The NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector. We are also required by law (under the NVETR Act) to disclose your personal information to the relevant state or territory training authority.

How NCVER and other bodies handle your personal information

NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the Privacy Act 1988 (Cth) (Privacy Act) and the NVETR Act. Your personal information may be used and disclosed by NCVER for purposes that include populating authenticated VET transcripts; administration of VET; facilitation of statistics and research relating to education, including surveys and data linkage; and understanding the VET market.

NCVER is authorised to disclose information to the Australian Government Department of Employment and Workplace Relations (DEWR), Commonwealth authorities, state and territory authorities (other than registered training organisations) that deal with matters relating to VET and VET regulators for the purposes of those bodies, including to enable:

- administration of VET, including program administration, regulation, monitoring and

evaluation

- facilitation of statistics and research relating to education, including surveys and data linkage
- understanding how the VET market operates, for policy, workforce planning

  and consumer information.

NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf. NCVER does not intend to disclose your personal information to any overseas recipients.

For more information about how NCVER will handle your personal information please refer to the NCVER's Privacy Policy at www.ncver.edu.au/privacy.

If you would like to seek access to or correct your information, in the first instance, please contact your RTO using the contact details listed below.

DEWR is authorised by law, including the Privacy Act and the NVETR Act, to collect, use and disclose your personal information to fulfil specified functions and activities. For more information about how DEWR will handle your personal information, please refer to the DEWR VET Privacy Notice at https://www.dewr.gov.au/national-vet-data/vet-privacy-notice.

Surveys

You may receive a student survey which may be run by a government department or an NCVER employee, agent, third-party contractor or another authorised agency.

Please note you may opt out of the survey at the time of being contacted.

Contact information

At any time, you may contact Breakthru to:

- Request access to your personal information
- Correct your personal information
- Make a complaint about how your personal information has been handled
- Ask a question about this Privacy Notice

You can contact Breakthru College (RTO 91512) via the following:

- Email: hello@breakthrucollege.edu.au
- Telephone: 1800 767 212
- Head office: Level 10 / 52 Alfred St Milsons Point NSW 2061

Disclosure of your personal information

We may disclose your personal information to:

- Any of our employees, officers, insurers, professional advisors, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.
- Any organisation or person with the customer's expressed permission/authority.

We may from time to time need to discuss personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request. We may also use your personal information to protect the copyright, trademarks, legal rights property or safety of Breakthru (breakthru.org.au), its customers or third parties.

Information we collect may from time to time be stored, processes in or transferred between parties located in countries outside of Australia. These include, but are not limited to, the USA.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be

disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosures covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

Direct marketing materials

Breakthru may send customers direct marketing communications and information about our products and services that we consider may be of interest to our customers. These communications may be sent in various forms, including mail, SMS, email or telephone, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). Our customer's preference of method of communication will be used whenever practical to do so. In addition, our customers, at any time may opt-out of receiving marketing communication from us by contacting our Privacy Officer or by using opt-out facilities provided in the marketing communication. Breakthru may provide customer personal information to other organisations contracted to provide direct marketing on behalf of Breakthru. We will take all reasonable steps to ensure our contractors are compliant with our Privacy Policy before providing such data.

Security of your personal information

Breakthru is committed to ensuring that the information you provide us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Access to your personal information

You may request details of personal information that we hold about you in accordance with the provisions of the *Privacy Act* 1988 (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email our Privacy Officer at privacy@breakthru.org.au.

There may be instances where Breakthru cannot grant access to the personal information held. For example, Breakthru may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If this happens, Breakthru will provide written notice outlining the reasons for the decision and available complaint mechanisms.

Website

When you visit our website:

When you visit our website (breakthru.org.au) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our services.

Cookies:

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.

Our website may from time to time use cookies to analyse website traffic and help us provide better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google AdWords. These ads may appear on this website or other websites you visit.

Third Party Sites:

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or

endorsement or approval of these websites. Please be aware that Breakthru is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal information.

Changes to privacy policy

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modification will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Policy.

Complaints about privacy

If you have any complaints or would like to provide feedback about our privacy practices, please feel free to send in details of your complaints to:

Privacy Officer

10 / 52 Alfred St Milsons Point NSW 2061

E: privacy@breakthru.org.au

We take complaints seriously and will respond to you very quickly after receiving written notice of your compliant or feedback.