

Privacy Policy

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1 Organisational Statement

- 1.1 Mastery Schools Australia (the **School**, **we**, or **our**) is committed to protecting the privacy of individuals and the handling of personal information in a responsible and respectful manner, and in accordance with privacy law.
- 1.2 For its Australian operations, the School handles personal information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles. Electronic marketing communications are also managed in accordance with the Spam Act 2003 (Cth). When handling health information in New South Wales, the School also complies with the Health Records and Information Privacy Act 2002 (NSW), including the Health Privacy Principles..

2 Scope

This Policy applies to all campuses under the MSA banner, its staff and anyone else acting for or on behalf of MSA, and it is the responsibility of all to understand and comply with this policy.

3 Purpose

3.1 This Privacy Policy (**Policy**) outlines our commitment to privacy and describes how the School manages personal information, including health and other sensitive information. It explains how the School collects, uses, discloses, and stores personal information, and how individuals may access or correct that information.

3.2 It also explains how individuals can make an enquiry or a complaint about a breach of privacy, and how complaints will be handled.

4 Definitions

4.1 For the purpose of this policy:

- (a) **Personal information** means information (or an opinion) about a person, which could reasonably identify them.
- (b) **Sensitive information** is a category of personal information that can include race or ethnicity, political opinions or membership, religious or philosophical beliefs, professional or trade association or union membership, sexual preferences or practices, criminal records, health information or genetic/biometric information such as fingerprints. The School has additional obligations for the management of sensitive information (including health information).

5 Collection

Information we collect

5.1 In the course of undertaking and delivering our education functions and activities, the type of personal information we collect may vary depending on how individuals engage with us. We may collect and hold personal information about current and prospective students, parents/guardians, suppliers, candidates for employment, employees, contractors, volunteers, and other members of the public who interact with the School.

5.2 The type of personal information we collect may include:

- (a) name
- (b) personal contact details including email, residential address and phone number
- (c) business contact details including email, job title and organisation
- (d) date of birth
- (e) government or agency issued ID such as Medicare, drivers' licence, current working with children check
- (f) next of kin details
- (g) banking details
- (h) marketing preferences
- (i) photographs
- (j) user data of official School social networking accounts
- (k) any other information provided to us or authorised by individuals for us to collect as part of their involvement with the School.

How we collect information

- 5.3 We will always try to collect information directly from the individual or their authorised representative (such as parents/guardians) within the requirements of applicable privacy law where it is reasonably necessary and practicable to do so. Personal information may be collected when interacting with our staff, completing physical or online forms, scanned copies of documents and certificates, postal mail, at MSA events, through security controls telephone, or email.
- 5.4 We may also collect information about individuals from other sources such as contracted service providers who assist us to operate our school, or when the individual has consented to sharing information with us through a third party.
- 5.5 Where the School receives personal information about an individual that is unsolicited or not reasonably necessary for one or more of our functions or activities, it will be deleted or de-identified, or the School will notify the individual of its collection, its use, and their rights.
- 5.6 Individuals can choose to remain anonymous or use a pseudonym where practicable, but this may limit our ability to engage with individuals for the purpose intended or meet our legal and regulatory obligations. For example, we would not be able to enrol a student or fulfil our enrolment obligations.

Sensitive information

- 5.7 The School generally only collects sensitive information if we are authorised with your consent or where it is required by law. This might include information about police checks, working with children checks, and health information.
- 5.8 If we require sensitive information for one or more of our functions or activities, we will only collect it from the individual or their authorised representative for a specific purpose.

6 Use of Personal Information

- 6.1 The School will use and share personal information for the purpose for which we have collected it. This includes but is not limited to the following general purposes:
- (a) to identify a person such as prospective students and candidates for employment
 - (b) to undertake and deliver education and education related services
 - (c) to fulfill our obligations to enrolled students including providing proper schooling and care
 - (d) to communicate with parents/guardians about their child's enrolment
 - (e) to establish and manage the relationship with our employees, contractors and volunteers
 - (f) to administer our relationship with donors, scholarship and prize recipients, alumni
 - (g) to provide a safe and secure school environment
 - (h) to respond to general inquiries, service requests, and information requests from the School community and members of the public
 - (i) to manage our contractors and suppliers
 - (j) research and quality improvement of our learning environment and services
 - (k) to communicate with our School community about school developments and fundraising initiatives
 - (l) for a purpose consented to
 - (m) to comply with our legal and regulatory requirements including the School's child safety obligations, school registration requirements, and statutory reporting.

- (n) to send information about enrolment opportunities, school programs, events, promotions and community engagement initiatives where the individual has consented to receive marketing communications or where the communication is otherwise permitted by law. Consent to receive marketing is optional and may be withdrawn at any time using the unsubscribe facility provided or by contacting the School directly..

6.2 We may also use and disclose personal information for a related secondary purpose (or directly related secondary purpose in the case of sensitive information) and where the individual reasonably expects, where we are authorised or otherwise required to by law, such as providing information to government departments or agencies.

7 Disclosure to others

- 7.1 The School does not sell, rent or trade personal information to, or with, third parties.
- 7.2 Where necessary and appropriate, we share personal information with third parties including:
 - (a) financial institutions
 - (b) regulatory agencies or government bodies (such as education departments or regulatory authorities in relevant states and territories, and the Australian Taxation Office)
 - (c) our contracted service providers who provide us with a range of professional, educational, and business services
 - (d) information technology vendors
 - (e) professional advisers (such as recruitment advisers, auditors, accountants, insurers, and lawyers)
 - (f) externally hosted applications and software subscriptions (for example, for recruitment and onboarding of employees)
 - (g) to an organisation that assists in the School's fundraising, for example, the School's alumni organisation.
 - (h) as required or authorised by law
 - (i) or, otherwise where we have consent from individuals.

8 Access and Correction

- 8.1 Individuals have a right to contact us about their privacy concerns or about personal information we may hold about them. Individuals have a right to:
 - (a) access and correct their personal information

- (b) opt-out at any time where our use or disclosure relies on consent.
- 8.2 Individuals can contact us at any time using the details below (section 12: Contacting Us).
- 8.3 Employees have direct access to their personal information via our human resources platform and can contact the HR Manager for advice on how to access and correct their personal information.

9 Storage, protection and retention

- 9.1 The School holds and stores data in hard copy documents or as electronic data in our software or systems, including cloud or other types of electronic storage.
- 9.2 The School uses physical, technical and organisational safeguards to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. These safeguards include managed access controls, security measures for access to premises and contractual requirements for third-party service providers to handle personal information only as authorised and in accordance with applicable privacy laws, including requirements relating to cross-border disclosures..
- 9.3 Personal information may be disclosed to third parties in Australia where it is necessary to perform our core business functions and administer services consistent with this Policy.
- 9.4 The School retains personal information only for as long as it is reasonably required for the purpose for which it was collected and to meet its legal, regulatory, safeguarding and operational obligations. When personal information is no longer required, it will be securely destroyed or permanently de-identified in accordance with the School's applicable Record Retention Policy and Procedure.
- 9.5 The following retention periods apply to information collected through the School's website and associated forms:
 - (a) Enquiry and Expression of Interest information is retained while the enquiry remains active and for two (2) years after the enquiry is closed or the School's last substantive contact with the individual, whichever occurs later.
 - (b) Mailing-list information is retained while the individual remains subscribed. Where there has been no meaningful interaction for twenty-four (24) months, the School may seek renewed consent or remove the individual's information from the active mailing list. If an individual unsubscribes or withdraws consent, marketing communications will cease and their information will be removed from the active mailing list within five (5) working days. A minimal consent and suppression record

may be retained for seven (7) years to demonstrate compliance and prevent the individual from being inadvertently re-added.

- (c) Payment records, including invoices, receipts, transaction records, fee refunds and payment confirmations, are retained for seven (7) years after the end of the financial year to which the transaction relates.

- 9.6 A different or longer retention period may apply where an enquiry progresses to enrolment or where information relates to child safety or safeguarding, a complaint, legal proceedings, an audit or investigation, an applicable disposal freeze, or another legal requirement. The applicable Record Retention Policy and Procedure contains further information about record ownership, retention, disposal and destruction requirements.

10 Children's privacy

- 10.1 The School has obligations to create a safe school environment for our current and prospective students. Accordingly, the School recognises that the rights of children and young people in relation to privacy might restrict access to the child's/young person's personal, sensitive or health information by parents or guardians.
- 10.2 The School will respect requests for privacy where permitted and appropriate in the circumstances, having regard to the child's/young person's capacity to consent and maturity, and any legal obligations.
- 10.3 Our child safety commitment and obligations to comply with Child Safety Law require that we maintain records and meet information sharing and reporting obligations in response to suspected child abuse.

11 Website privacy

- 11.1 The School may collect personal information through its website when an individual submits an enquiry, Expression of Interest or other online form, subscribes to communications, makes a payment where this functionality is available, or otherwise provides information to the School. The website may also automatically collect the technical and usage information described below.
- 11.2 Information recorded when users interact with our website includes:
 - (a) IP address,
 - (b) location data (where available and not disabled by the user),
 - (c) the type of web browser used
 - (d) dates, times, and other user activity.
- 11.3 In most cases, we will not be able to reasonably identify a visitor to our website from the information collected. However, if cookies or similar technologies are linked with personal information we hold about a user, this cookie information

becomes personal information and will be treated in the same manner as the personal information to which it has been linked. A cookie is a small text file that is sent to a device by the user's web browser which then stores a record of the visit in the web browser used. Cookies enable the proper functioning of our website and assist us to improve our website browsing experience. Users can manage their cookie settings via their web browser privacy settings.

- 11.4 Our website also uses interfaces with social media sites such as Facebook, Instagram, LinkedIn and links to third party websites. The School is not responsible for the protection of personal information provided to third parties where individuals choose to navigate to them via our website. Social networking services will also use your personal information for their own purposes. We recommend users review the privacy policy applicable to the website visited.

12 Contacting Us

- 12.1 If you have any inquiries or complaints about our privacy practices or wish to enquire about how your or your child's personal information is managed, please contact the Privacy Officer.
- 12.2 All privacy related inquiries or complaints should be directed to the contact details below:
- (a) Privacy Officer
Ashleigh Mitchell
Mastery Schools Australia Ltd
15 Lake Street, Varsity Lakes, QLD 4227
ashleigh.m@msa.qld.edu.au
Tel: (07) 5574 7300 - Opt. 6
- 12.3 We will endeavour to respond to all requests within 30 days and may require individuals to verify their identity as part of our management of their request.
- 12.4 All complaints will be dealt with fairly and as quickly as possible.
- 12.5 If a complaint remains unresolved or our response is not considered satisfactory, individuals may lodge a complaint with the Office of the Australian Information Commissioner (OAIC), which is the national regulator for privacy and information rights.
- (a) Visit: www.oaic.gov.au
Phone: 1300 363 992
Email: enquiries@oaic.gov.au

13 Changes to our Privacy Policy

- 13.1 This policy will be reviewed every two (2) years or more frequently if operational changes impact privacy and data management compliance. Updates may be published on our website without notice.
- 13.2 An updated version of this Policy will take effect when it is published on the School's website. Where a change materially affects how the School handles personal information, or where consent is required by law, the School will provide additional notice or seek consent as appropriate.
- 13.3 This policy was last updated in August 2026.

14 Authorisation

- 14.1 Reviewed and approved by the board on June 2024.
- 14.2 Any amendments to this policy must be approved by the Board.

