



# KAMBALA

## PRIVACY POLICY

Kambala (ACN 000 016 811) respects the privacy of individuals and is bound by the Australian Privacy Principles (APPs) contained in Schedule 1 of the *Privacy Act 1988* (Cth) (**Privacy Act**).

### About this Privacy Policy

This Privacy Policy will assist you in understanding how Kambala manages your personal information.

By way of background, when this Privacy Policy refers to 'personal information' it refers to 'personal information' as defined in the Privacy Act. Common examples of 'personal information' are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and employment details.

Kambala may change this Privacy Policy from time to time, for example:

- to comply with new laws;
- to reflect the integration of new technologies into Kambala's systems;
- to accommodate changes to Kambala's operations and practices; or
- to make sure Kambala's policies remain suitable to the changing school environment.

All personal information which is held by Kambala is governed by Kambala's most recent Privacy Policy.

If you are unsure about whether you are reading Kambala's most recent Privacy Policy, please contact Kambala (using the contact details in the 'Enquiries and Complaints' section below). Kambala can provide you with a copy of Kambala's most recent Privacy Policy upon request. Alternatively, you can access it on Kambala's website <http://www.kambala.nsw.edu.au/> (**Website**) via the privacy link: <http://www.kambala.nsw.edu.au/various/privacy-statement/>.

### The kinds of personal information that Kambala collects and holds

Due to the nature of its activities, Kambala typically collects personal information about:

- students and parents/guardians before, during and after the course of a student's enrolment at Kambala;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with Kambala.

The type of personal information collected by Kambala varies in each case. It can include your:

- name, date of birth, gender, contact details (including residential address, postal address, email address or phone numbers), employment details, employment history and financial information;
- details about your citizenship, residency or visa status;
- racial or ethnic origins, religious or philosophical beliefs, membership of a professional or trade association, membership of a trade union or criminal record;
- health information;
- special needs, any distinguished talents and/or special interests.

Under the Privacy Act, the Australian Privacy Principles do not apply to Kambala's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Kambala and employee. As a result, this Privacy Policy has limited application to personal information collected from employees.

### **How Kambala collects personal information**

Kambala can collect personal information from various sources, including:

- directly from you - although, in the case of a student, personal information will often be collected from the student's parents/guardians;
- from third parties which are authorised to disclose your personal information to Kambala;
- from government agencies and entities; or
- from publicly available sources of information.

Kambala's methods of collections include collecting information from:

- paper and electronic forms that you complete and submit to us;
- notes taken during face-to-face meetings and interviews;
- telephone calls, emails and facsimile transmissions;
- reports provided by a medical or other professional; and
- references from third parties (including a former student, another school or an employer).

Where necessary, Kambala will seek specific consents at the time of collection. By way of an example, Kambala will generally seek your specific consent when Kambala collects sensitive information or health information about you.

### **Anonymity and pseudonymity**

You have the right to not identify yourself, or to use a pseudonym, when dealing with Kambala in relation to a particular matter. However, for most of its functions and activities, Kambala needs

your name and sufficient information to enable Kambala to respond to your application, enquiry, request or complaint.

If Kambala does not receive sufficient information about a student, parent or guardian, Kambala may not be able to enrol or continue the enrolment of the student.

### **How Kambala holds personal information**

Kambala takes the privacy of personal information seriously and is committed to maintaining the security of personal information under Kambala's control.

Kambala uses a combination of technical solutions, security controls and internal processes to protect personal information held by Kambala from loss and from unauthorised use, access, modification or disclosure. This includes the use of locked storage for paper records and the use of username, passwords and access rights for computerised records.

In addition:

- School staff are regularly informed of their obligations to treat personal information in accordance with this Privacy Policy and all applicable privacy laws. Additional information is also provided to staff in Kambala's staffroom;
- Kambala's Privacy Officer is responsible for ensuring that all personal information collected by Kambala is managed in accordance with this Privacy Policy and all applicable privacy laws; and
- parents/guardians are informed of the contents of this Privacy Policy via the Website.

Kambala may need to keep your personal information for a significant period of time. However, Kambala will destroy or de-identify your personal information when it is no longer needed by Kambala.

### **How Kambala uses and discloses personal information**

#### *Use of personal information of students, parents and guardians*

The main activity of Kambala is to provide schooling for students, as well as other related services. In order to do so effectively, Kambala may use personal information about students, parents or guardians for a range of different purposes, including:

- to facilitate student enrolment;
- to verify a student's or parent's/guardian's identity;
- to satisfy both the needs of parents/guardians and the needs of the student while the student is enrolled at Kambala;
- to communicate with parents/guardians and to keep them informed about matters related to the student's schooling, through correspondence, newsletters and magazines;
- to report to students and their parents/guardians about Kambala's activities, including

through newsletters and magazines and Kambala album;

- for Kambala's day-to-day administration;
- to look after a student's educational, social and medical wellbeing;
- to seek donations, market Kambala and engage in fundraising activities;
- to satisfy Kambala's legal obligations and allow Kambala to discharge its duty of care; and
- to perform research and analysis.

Where necessary, Kambala will seek specific consents for certain uses of personal information about students, parents or guardians.

#### *Use of personal information of job applicants, staff members and contractors*

Kambala may use personal information about job applicants, staff members and contractors for a range of different purposes, including:

- to assess their suitability for the job;
- to administer their employment or contract, as applicable;
- for insurance purposes;
- to seek funds and market Kambala; and
- to satisfy Kambala's legal obligations, for example, in relation to child protection laws.

#### *Use of personal information of volunteers*

Kambala uses personal information about volunteers who assist Kambala in its functions or conduct associated activities (such as alumni associations) to enable Kambala and the volunteers to work together.

#### *Disclosure of personal information*

Kambala may disclose your personal information:

- to Australian government departments, state government agencies and designated bodies who are authorised to require and collect personal information. By way of examples, Kambala may disclose personal information to the Association of Independent Schools of NSW (for the purposes of accessing Commonwealth funding and other support services), to the New South Wales Department of Education and Training (for the purpose of parents receiving the back to school allowance), or, in the case of overseas students, to the Commonwealth Department of Education and Training (as part of the student's visa application process and to comply with the Education Services for Overseas Students legislative framework);
- to medical practitioners and other professionals (including occupational and speech therapists, counsellors and social workers), where Kambala is authorised or otherwise legally required to do so;
- to third parties who provide services to Kambala, such as administrative tasks, marketing, teaching services, student support, data consolidation, data storage and information

technology. For clarity, this includes specialist visiting teachers and sports coaches;

- to organisations that assist Kambala in its fundraising activities, such as the Kambala Foundation or KOGU;
- to recipients of School publications, like newsletters and magazines which may for example include the names and photos of students participating in school activities;
- where Kambala is authorised or otherwise legally required to do so (including disclosing information to law enforcement agencies); or
- if Kambala believes the disclosure is necessary to prevent a serious threat to life or health.

### **Overseas disclosure**

Kambala does not normally disclose your personal information to recipients who are based outside Australia. However, Kambala may disclose your personal information in the course of facilitating a student exchange or organising an excursion overseas (in which case Kambala will seek the necessary consents). Kambala may also store information by way of cloud computing, in which case personal information may be stored on servers located outside Australia (such as the United States, the European Union and Singapore).

### **How Kambala keeps personal information accurate, complete and up-to-date**

Kambala endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. However, you are encouraged to contact Kambala as soon as possible in order to update any personal information which Kambala holds about you.

### **How to access or correct personal information**

If you would like to access any personal information which Kambala holds about you, or would like to correct any errors in that information, please contact Kambala (using the contact details in the 'Enquiries and Complaints' section below) so that Kambala can consider and respond to your request.

Kambala may require you to verify your identity and clarify what information you wish to access or correct.

In some cases, Kambala may decline your request to access or correct your personal information, for example if:

- Kambala reasonably believes that giving access would pose a serious threat to the life or safety of any individual;
- giving access would have an unreasonable impact on the privacy of other individuals; and/or
- your request for access is frivolous or vexatious.

If Kambala declines a request to access or correct your personal information, Kambala will (within

a reasonable time) provide you with a written explanation including the reasons for the refusal.

In accordance with the Privacy Act, Kambala may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, Kambala will advise you of the likely cost in advance.

### **Consent and rights of access to the personal information of students**

Kambala respects every parent's/guardian's right to make decisions concerning their child's education.

Generally, Kambala will refer any requests for consent and notices in relation to the personal information of a student to the student's parents/guardians. Kambala will treat consent given by parents/guardians as consent given on behalf of the student, and notice to parents/guardians will act as notice given to the student.

Parents/guardians may seek access to personal information held by Kambala about their child by contacting Kambala (using the contact details in the 'Enquiries and Complaints' section below). In certain circumstances, such access may be denied.

Students will generally have access to their personal information through their parents/guardians, but older students may seek access themselves subject to Kambala's discretion. For example, Kambala may, on the request of a student, grant that student access to information held about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents/guardians. In exercising its discretion, Kambala will consider the maturity of the student and/or the student's personal circumstances.

### **Enquiries and Complaints**

If you would like further information or wish to lodge a complaint about the way Kambala manages your personal information, please contact Kambala Privacy Officer:

Colette Kenny  
Privacy Officer  
Telephone: (02) 9388 6777  
Email: [colette\\_kenny@kambala.nsw.edu.au](mailto:colette_kenny@kambala.nsw.edu.au)

If Kambala receives a privacy complaint from you, Kambala will investigate your complaint and aims to respond to you as soon as possible after the receipt of your complaint.

It is Kambala's intention to resolve any complaint to your satisfaction. However, if you are unhappy with Kambala's response or if you do not wish to send your complaint to Kambala, you are entitled to contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 or other contact details on the OAIC's website ([www.oaic.gov.au](http://www.oaic.gov.au)).

Last revised: May 2017