**DBA Global Pty Ltd's Privacy Policy follows the standards of the Australian Privacy Principles set by the Australian Government under the Privacy Act.**

**1. Background**

DBA Global Pty Ltd Pty Ltd ABN 73 656 772 048 (we, us, our) provides a range of short courses here in Australia and overseas.

We are committed to protecting the privacy of your personal information. This Privacy Policy explains how we collect, use, disclose and otherwise handle personal information. It also tells you how you can ask to access and correct the personal information we hold about you or complain about a suspected privacy breach.

We are required to comply with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). The APPs regulate the manner in which personal information is handled.

We are also required to comply with the more specific privacy legislation in some circumstances, such as applicable State and Territory health privacy legislation, the Spam Act 2003 (Cth) and the Do Not Call Register Act 2006 (Cth).

By accepting this Privacy Policy, you expressly consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy.

By publishing this Privacy Policy, we aim to make it easy for our customers and the public to understand what personal information we collect and store, why we do so, how we receive and/or obtain that information and the rights you have with respect to your personal information in our possession.

This Privacy Policy follows the standards of the Australian Privacy Principles set by the Australian Government for the handling of personal information under the Privacy Act.

**2. What types of information do we collect?**

**2.1 Personal Information**

The type of personal information we collect and hold about you depends on the type of dealings that you have with us. If we need to identify you or verify your identity, we may collect your name, gender, date of birth, driver’s licence and/or passport details, student ID number, username, password, security question and answer. If we need to communicate with you, we may collect your email, residential and postal addresses and telephone numbers. If you apply to enrol in a course of study or otherwise access our services, we may collect details of your educational credentials, enrolment details, academic results, banking and payment details and tax file number (TFN).

To assist us in understanding your engagement with DBA Global Pty Ltd and to ensure the communication you have with DBA Global Pty Ltd is relevant, we may also record your IP address and history of engagement with the DBA Global Pty Ltd website and documents accessed.

As a student, we will maintain your ongoing activity history as an enrolled student, including assessment records, progress and completion information, enquiries and complaints.

To help us improve our services, we may collect your responses to surveys and details about how, when and why you access our services.

If you apply for a job with us, we will collect the information you include in your application.

**2.2 Sensitive information**

Sensitive information is personal information such as health information and information about racial or ethnic origin that is generally afforded a higher level of privacy protection.

In order to comply with our obligations under Australian law, we may collect sensitive information on behalf of the Australian Government, including your language background, citizenship status, status as an indigenous Australian, disability status and health information.

We only collect sensitive information where it is reasonably necessary for our business functions, and you have consented, or we are required to do so by law.

**2.3 Information other than personal information (“non-personal information”)**

When you visit our website, some of the information that is collected about your visit is not personal information, because it does not reveal your identity. We use this information to help us improve our services. We may aggregate this information for our own statistical purposes. Provided that it remains anonymous, we may disclose that aggregated information to third parties or publish it for marketing or research purposes.

**Site visit information**

We may record your server address, the date, time and duration of your visit, the search terms you used, the pages you viewed, any documents you downloaded and the type of device, browser and operating system you used.

**Cookies**

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use do not identify individual users.

We use cookies to hold anonymous session information. This information is used to personalise your current visit to the website.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your Internet browser to reject cookies or to notify you when they are being used. Rejecting cookies can, however, limit the functionality of our websites.

We may remarket your information. Remarketing is a way for us to connect with users, based upon your past interactions with the DBA Global Pty Ltd website. Third-party marketing vendors may be hired by DBA Global Pty Ltd to perform remarketing services. As a result, third-party vendors, including Google, may show DBA Global Pty Ltd ads on sites on the internet. Third-party vendors, including Google, use cookies to serve ads based on a user's prior visits to the DBA Global Pty Ltd website.

Any information collected is used only for remarketing purposes and will not be used by them for any other purpose.

**2.4 Disposal of Personal and Sensitive Information**

DBA Global Pty Ltd only retains a student’s personal and sensitive information for as long as required to fulfil its obligations as a non-accredited education provider.

**3. How do we collect personal information?**

**3.1 Methods of Collection**

We will collect personal information by lawful and fair means as required by the Privacy Act. We will also collect personal information directly from you where this is reasonable and practicable.

We collect personal information in a number of ways, including:

* Directly from you in person, over the phone, through written communications (either on paper or electronic) or by you completing forms or answering questions on our websites;
* From third parties, including direct marketing database providers, government agencies, our related companies and your authorised representatives;
* From our own records of your use of our services.
* Communicating with our Course and Career Advisors
* Communicating with Trainers and Assessors
* Communicating with our Education Managers
* Communicating with the Student Support Team
* Logging on to and engaging with the content and services provided by our learning portal (DBA Global Pty Ltd Learning Management System)
* Requesting further information relating to courses offered by DBA Global Pty Ltd
* Communication with the DBA Global Pty Ltd Accounts Team
* Managing complaints and appeals

**4. Why do we collect, hold, use and disclose your personal information?**

**4.1 General**

The main purposes for which we collect, hold, use and disclose personal information is:

* To identify you and verify your identity;
* To communicate with you about our products and services;
* To provide our services to you, including:

o   Facilitating your enrolment in a course of study;

o   Facilitating your access to online and offline education;

o   Facilitating your communications with others via our website; and

o   Obtaining payment for our services;

* For purposes required or authorised by or under law;
* To help us improve our services;
* For any other purposes that you have consented to.

Individuals have the right to choose not to disclose personal or sensitive information to DBA Global Pty Ltd. However, this may limit or prevent DBA Global Pty Ltd's ability to provide services.

**4.2 Direct marketing**

Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your personal information to send you information about the services we offer, as well as other information. We may send this information by (yet not limited to) mail, email, social media, SMS, MMS and telephone.

**Opting out**

You can opt out of receiving these communications at any time in the following ways:

* Contact us (see section 10 below) and tell us;
* Use the unsubscribe facility that we include in our commercial electronic messages (i.e. email or SMS) to opt out of receiving those messages.

**5. To whom do we disclose your personal information?**

5.1 We may disclose your personal information to any of the organisations that we deal with in the ordinary administration of our business for the purposes set out in section 4 above, including:

* Financial institutions;
* Potential employers;
* Third-party debt collection agencies;
* The Police, where an alleged breach of the Student Code of Conduct may involve criminal behaviour
* Our contracted service providers, including:

o   Trainer and tutors;

o   Information technology service providers (including cloud services providers);

o   Marketing, communications and research agencies;

o   Mailing houses, postal, freight and courier service providers;

o   Printers and distributors of direct marketing material;

o   Recruitment agencies;

o   External business advisers (such as recruitment advisers, auditors and lawyers);

o   Any other third parties whom we engage to perform services, functions or responsibilities on our behalf;

o   Any person to whom we sell (or propose to sell) all or any part of our business or assets;

* We may also disclose your personal information to third parties who offer goods and/or services that we believe you may be interested in for the purposes of those third parties directly marketing to you.

You expressly consent to any such third parties using your personal information for any purpose consistent with our lawful use of your information or for any other purpose consistent with the normal functions of the recipient.

Without limiting any other part of clause 5, we may engage a third-party student recruitment service provider to perform certain business functions. You expressly consent to us disclosing your personal information to a third-party student recruitment service provider for the purpose of that provider:

* Communicating with you (whether by email, phone, SMS/MMS, or direct mail) about education or training courses offered by third-party education or training organisations (“Courses”);
* Vetting and evaluating your personal information to determine your suitability for Courses;
* Marketing Courses to you;
* Where agreed by you, enrolling you into a Course, and
* Preparing and maintaining relevant records and reports relating to its contact with you (including marketing and Course enrolments).

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you.

We may de-identify and aggregate the personal information of you and others for our own statistical purposes. Provided that it remains permanently de-identified, we may disclose that aggregated information to third parties or publish it for marketing or research purposes.

If you post comments or otherwise communicate publicly with other users via our website and/or social media channel, any information about yourself that you include in the communication may be stored on the website and accessed by other users. For this reason, we encourage you to use discretion when deciding whether to post any information that can be used to identify you.

**6. Cross border disclosure of personal information**

We may transfer your personal information to an overseas jurisdiction. In doing so, we will endeavour to ensure that the recipient is lDBAted in a jurisdiction which has similar data protection laws, or similar data protection regime, to that which applies in Australia, pursuant to which you are able to take direct action to enforce your rights. In these circumstances, we will no longer be responsible for the handling of your information by the recipient.

Where it is not possible for us to ensure your information is transmitted to such a jurisdiction, you nevertheless consent to us transferring our personal information to an overseas recipient or normal business purposes but in such cases we will remain responsible for ensuring your rights under Australian law are not infringed.

For the avoidance of doubt, we reserve the right to outsource the handling of your personal information to a cloud storage provider lDBAted in an overseas jurisdiction.

**7. Third-Party Information Sharing**

Data Sharing with Third Parties: We may share your personal information with educational providers or partners, to offer you relevant courses or services tailored to your interests as part of our accelerated learning pathways.

Purpose of Sharing: Your data may be shared to provide educational opportunities, course recommendations, or for other related purposes.

Consent: By using our services, you consent to the sharing of your information with these third parties. You will have the option to opt-out at any time.

Opt-Out Option: If you prefer not to have your information shared with third parties, you may opt-out by following the opt-out link or replying STOP at anytime.

Data Security: We ensure that any third party we share your information with will handle it securely and use it only for the purposes outlined.

**8. Data quality and security**

**8.1 General**

We hold personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in secure premises. Paper files may also be archived offsite in secure facilities. We take reasonable steps to:

* Make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
* Protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure;
* Destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

**8.2 Security**

The steps we take to secure our personal information include ICT security (such as encryption, firewalls, secure server environments, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies.

**Payment Security**

We process payments using EFTPOS and online technologies. All transactions processed by us meet industry security standards to ensure payment details are protected.

**Website security**

While we strive to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact us by telephone or post (see section 10 below).

You can also help to protect the privacy of your personal information by maintaining the confidentiality of your Learning portal account (including your password), and by ensuring that you log out of your account on (learning portal) when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

We may appoint a Privacy Officer to oversee the management of this Privacy Policy and compliance with the Privacy Act. This officer may have other duties within our business and also be assisted by internal and external professionals and advisors.

**9. How can you access and correct your personal information?**

You can request access to the personal information that we hold about you and request corrections by contacting our Privacy Officer (see section 10 below). DBA Global Pty Ltd will authenticate a student’s identity prior to releasing any personal and/or sensitive information held about the student.

In the event a request to access personal and sensitive information presents a risk relative to Australian Privacy Principle subclause 12.3 (for example, releasing the information may have an unreasonable impact on the privacy of other individuals), DBA Global Pty Ltd may refuse such a request, or provide access to subsections of the information. In such cases, the Privacy Officer will advise the student in writing of the decision relating to the request and the reasons for the decision.

DBA Global Pty Ltd will respond to requests for access to personal and/or sensitive information within three business days.

DBA Global Pty Ltd endeavours to maintain accurate and up-to-date information relating to a student during their enrolment period.

Students are able to confirm and update their personal and sensitive information by contacting the Student Support Team at CONTACT@DBAGLOBAL.COM.AU

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in actually providing you with access.

**10. Complaints**

If you have a complaint about how we have handled your personal information, please contact our Privacy Officer (see section 10 below).

Our Privacy Officer will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week.

If your complaint can't be resolved at first instance, we will ask you to complete a Complaint Form.

**Complaints process**

For full details on our complaints process, please see the Student Handbook, which is lDBAted on our website.

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner (see [**here**](https://www.oaic.gov.au/individuals/what-can-i-complain-about)for further information).

**11. Further information**

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details for privacy queries are set out below.

**Privacy Officer**

DBA Global Pty Ltd

**Contact Us:**PO BOX 1111, WYNNUM QLD 4178

+ 07 3085 4379
 **Email our friendly team:****CONTACT@DBAGLOBAL.COM.AU**

**11. Changes and additions to this Policy**

We may amend this Privacy Policy from time to time. If we do decide to change this Privacy Policy, we will post the changes on our website.  The current version will be posted on our website, and a copy may be obtained from our Privacy Officer.

We may do things in addition to what is stated in this Privacy Policy to comply with the Privacy Act, and nothing in this Privacy Policy shall deem us to have not complied with the Privacy Act.