

Privacy Policy

1. Who are we?

- 1.1. OLN A Support Pty Ltd (ACN 624 860 528) trading as ATAR Support, of Denning & Associates Suite 7, 177-179 Davy Street, Booragoon, Western Australia 6154, Australia (OLNA, ATAR, we, us and our) recognises and respects your privacy. We seek to manage your personal information in a fair, open and transparent way.
- 1.2. Whilst the *Privacy Act 1988* (Cth) (the Privacy Act) does not apply to us, as we are currently a small business, we are committed to the objectives of the Australian Privacy Principles (APPs) under the Privacy Act.
- 1.3. Our offices are in Western Australia.
- 1.4. This Privacy Policy sets out how and why we collect, store, use, disclose, secure, destroy and de-identify your personal information.

2. What does this Privacy Policy do?

- 2.1. This Privacy Policy explains:
 - (a) the kinds of personal information we collect and hold;
 - (b) how we collect and hold personal information, obtain your consent and how you may opt out;
 - (c) the primary and secondary purposes for which we collect, hold, use and disclose personal information;
 - (d) how you may access your personal information and correct it;
 - (e) how you may complain about a possible breach of privacy; and
 - (f) when we may disclose personal information to an overseas entity and the countries in which these entities are likely to be located.
- 2.2. The Privacy Policy is available free of charge on the OLN A and ATAR websites.
- 2.3. You may request the Privacy Policy in a specific format. We will take reasonable steps to give you a copy in that format.
- 2.4. Personal information includes information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.
- 2.5. By visiting our website, using and/or purchasing any of our services or otherwise providing your personal information to us, you agree to this Privacy Policy and its updates.

3. What do we do?

Our business involves providing online education resources, learning tools and practice materials for students, parents, guardians and/or schools, for the Western Australian Online Literacy and Numeracy Assessment (OLNA) and Australian Tertiary Admission Rank (ATAR) assessments, and the provision of associated services.

4. Can you be anonymous or use a pseudonym?

- 4.1. You may be able to deal with us without identifying yourself, that is, by remaining anonymous or using a pseudonym.
- 4.2. However, this does not apply if we are required or authorised by or under law or a court or tribunal order, to deal with an identified individual.

- 4.3. Also, if it is impracticable for us to deal with you in this way, we may ask you to identify yourself.
- 4.4. You acknowledge that if you do not provide identification, we may not be able to provide our services, contact you or assist you.

5. How and why do we collect and use your personal information?

- 5.1. The types of personal information that we collect will depend on the nature of your dealings with us.
- 5.2. We collect, hold and use your personal information for the purposes for which it was provided to us, related purposes or as permitted or required by law.
- 5.3. Those purposes may include, but are not limited to:
 - (a) operating and managing our business as described above;
 - (b) providing you with goods and/or services requested, generally online education services;
 - (c) billing you in relation to any goods and/or services;
 - (d) improving and marketing our services, including emails, online subscriptions, maintaining records and files and internal review and management reporting;
 - (e) responding to your inquiries and providing assistance to you and/or your students;
 - (f) processing online application forms from our website;
 - (g) providing you with publications, emails, newsletters and event invitations;
 - (h) managing our relationships with suppliers, contractors and third parties e.g. information technology suppliers such, third party payment entities, and/or database or web hosting providers;
 - (i) transactions, business dealings or regulatory relationships with governments or regulators;
 - (j) personnel management, employment and recruitment;
 - (k) occupational health and safety activities and compliance;
 - (l) undertaking all searches, including but not limited to searches about corporations, directorships and personal property; and
 - (m) complying with our legal, insurance obligations and legislation in Australia.
- 5.4. In certain circumstances, we may be required or permitted by law or a court or tribunal to collect and retain certain personal information about you.
- 5.5. Types of personal information (which may be sensitive information) that we may collect about you include, but are not limited to:
 - (a) your name and title;
 - (b) your contact details (address, email address, phone number, fax number);
 - (c) your age and date of birth;
 - (d) details about your school, occupation, industry or job title;
 - (e) details about your educational qualifications, professional memberships and associations, Professional clearances – WWC, TRBWA;
 - (f) details about your interests in education services;
 - (g) information about your dealings with us; and
 - (h) information relevant to our services to you.

- 5.6. We may collect your personal information in a number of ways, including but not limited to:
 - (a) through the OLNA and ATAR websites, including web pages and resources accessed, online forms, traffic data, location data, weblogs and other communication data;
 - (b) telephone, email, letter or facsimile;
 - (c) in person;
 - (d) publicly available sources;
 - (e) purchasing information from third-party providers; and
 - (f) cookies, apps, and online tracking.

6. Do we collect any sensitive personal information?

We will not collect and use sensitive personal information about you, such as: details of your racial or ethnic origin, political affiliation, religious beliefs, sexual preferences, criminal convictions, union memberships, or health, genetic or biometric information, unless it is required for the purposes of providing legal advice or required by law, court or tribunal or you expressly consent to provide this information.

7. Do you consent to our use of your personal information?

- 7.1. By using this website and/or our services, you are consenting to us managing your personal information in accordance with this Privacy Policy.
- 7.2. However, you have the right to opt out of our collection and use of your personal information. Please contact us directly if you would like to withdraw your consent for our management of your personal information.
- 7.3. We will seek express consent from an individual before handling the individual's sensitive information.
- 7.4. Further, OLNA is directed to users and subscribers who are residing in and using this Site within Australia:
 - (a) who are 15 years of age or older, who have capacity to provide consent; and
 - (b) whose parent(s), guardian(s), school or relevant Department of Education, provide permission and/or consent on their behalf.

8. When and where do we transfer your personal information overseas?

- 8.1. Your personal information may be disclosed to entities located overseas. For instance, via our arrangements with third party contractors and suppliers.
- 8.2. However, we are based in Australia and our server is based in Australia.
- 8.3. We seek to limit our overseas transfers and disclosures to jurisdictions with substantially similar privacy protections, but you should be aware of, and you consent to, the inherent risks of international transfers of personal information.
- 8.4. By using this website and/or our services, and providing us with your personal information, you are consenting to all overseas disclosures of personal information.

- 8.5. It is not our intention to offer goods or services to data subjects in the European Union.

9. Do we use cookies?

- 9.1. The OLN and ATAR websites use tracking technologies called “cookies” to monitor the pages accessed by browsers and/or users. Cookies are small text files which are stored in memory or on your hard drive for record keeping purposes.
- 9.2. The purpose of cookies is to personalise and customise webpages and services. Cookies can simplify the process of recording your personal information. They are used to help us enhance this website.
- 9.3. You can often accept or decline cookies on your web browser.
- 9.4. If you choose to opt-out of using cookies, you may not be able to fully experience some features of the OLN and ATAR websites.

10. What about other websites?

- 10.1. We are not responsible in any way for any links from the OLN and/or ATAR websites to third party websites.
- 10.2. We are not responsible for any content on third party websites.
- 10.3. You should consider the privacy policies on these websites and how these entities process and manage your personal information.

11. Do you consent to direct marketing?

- 11.1. You expressly consent to us using your personal information to contact you for marketing purposes including, but not limited to, new products, services, promotions or events, via any mode of communication.
- 11.2. We may also contact you about your opinion of current, potential or new services or products that may be offered by us.
- 11.3. If you do not wish to receive marketing communications from us, you may quickly and simply opt-out by contacting us directly.
- 11.4. We do not sell, rent or lease our personal information to third parties.

12. How do you secure my personal information?

- 12.1. The security of your personal information is important to us.
- 12.2. We take all reasonable steps in the circumstances to secure and protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.
- 12.3. We secure information you provide on computer servers in a controlled and secure environment.

13. Can I request access to my personal information?

- 13.1. You may request access to any of the personal information we hold about you. In most cases, a summary of your personal information will be freely available to you by contacting us.
- 13.2. Requests for access to your personal information will be handled within a reasonable period and we will endeavour to give you access to the information in the format and manner requested, if it is reasonable and practicable to do so.

- 13.3. We will endeavour to take reasonable steps to give access in a way that meets the needs of OLNAs and yourself, noting that access may be given using a mutually agreed intermediary.
- 13.4. If we charge for the giving of personal information, it will not be excessive, nor apply to the making of the request.
- 13.5. But please note that we are not always required to provide you with access to your personal information on request. We may refuse you access to personal information in a number of circumstances, such as:
- (a) where giving access would threaten life, health or safety of any individual or threaten public health or safety;
 - (b) where giving access would have an unreasonable impact on the privacy of other people;
 - (c) where information relates to existing or anticipated legal or enforcement proceedings;
 - (d) where access would reveal or prejudice commercial or legal negotiations, arbitrations or enforcement activities;
 - (e) where giving access would reveal evaluative information generated in connection with a commercially sensitive decision-making process;
 - (f) where denying access is required or authorised by law; or
 - (g) where the request for access is frivolous or vexatious.
- 13.6. If we deny your request for access to your personal information, we will explain why in writing and you may make a complaint to us.

14. How do I correct and ensure the accuracy of my personal information?

- 14.1. You may request that we correct any of your personal information, to ensure that the information is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete, relevant and not misleading. We will take reasonable steps in the circumstances to ensure that the information collected is accurate, up-to-date and complete.
- 14.2. You may also ask that we notify third parties about the correction and we will take reasonable steps to provide that notification, unless it is impracticable or unlawful to do so.
- 14.3. If we refuse your request, we will tell you in writing why we have done so and you may make a complaint to us.
- 14.4. You should be aware that if we refuse to correct your personal information, you may request that a statement be associated with the information. The statement can note that you believe that your personal information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take reasonable steps to make this statement apparent to users of the information.
- 14.5. We will respond to requests for correction or for an associated correction statement within a reasonable period. We will not charge a fee for receiving or processing either request.

15. What will you do if you have a data breach?

- 15.1. Depending on the circumstances, we may notify you, any affected individuals and if required, the relevant regulator, as soon as practicable after we become aware

that there are reasonable grounds to believe that there has been an eligible data breach.

- 15.2. If it is impracticable to notify all affected individuals, and depending on the circumstances of the breach, we may publish a statement on our website and publicise the content of the statement.
- 15.3. An eligible data breach is where there has been unauthorised access or disclosure, or loss of information where unauthorised access or disclosure is likely and a reasonable person would conclude that this access or disclosure would likely result in serious harm to the related individuals.
- 15.4. We will not provide notice where it would be inconsistent with secrecy provisions or prejudice law enforcement activities.
- 15.5. If we have taken sufficient remedial action in response to the eligible data breach, or if the regulator determines that notification is not required, then we may not notify you of the breach.

16. How long do you keep and then destroy my personal information?

- 16.1. As a company, we may have legal, audit or accounting obligations to retain records and files for certain periods.
- 16.2. In privacy law however, we are also required to take reasonable steps to destroy or de-identify the personal information we hold once the personal information is no longer required.
- 16.3. We will securely retain, destroy or de-identify your personal information as appropriate.

17. Will you update this privacy policy?

- 17.1. We may update this Privacy Policy at our discretion.
- 17.2. The updated policy will be placed, free of charge, on the OLN and ATAR websites.
- 17.3. Your continued use of the website or our services constitutes acceptance of any revised privacy and cookie policies.

18. Do you have a complaint about personal information and privacy?

- 18.1. In the first instance, please contact us via info@olna.com.au or info@atarsupport.com.au if you have a privacy complaint.
- 18.2. We will endeavour to resolve your complaint within 30 business days.
- 18.3. If you are not satisfied with our response, you may complain to a relevant regulator, such as the Office of the Australian Information Commissioner (OAIC).

19. How can I contact you?

- 19.1. We welcome your comments and feedback regarding this Privacy Policy.
- 19.2. To contact us in relation to this Privacy Policy, please email: info@olna.com.au or info@atarsupport.com.au.