

# PRIVACY POLICY

The Australian Boarding Schools Association (referred to as “ABSA” or “We” in this Privacy Policy) recognises that your privacy is very important to you and we are committed to protecting your personal information.

## **Collection of personal information**

ABSA collects both personal information and anonymous information. We collect personal information about you and your interactions with us, for example when you purchase an item from us or visit our website.

Personal information is collected only from your direct purchases, requests and correspondence, and only after you have consented to ABSA using this information by way of accepting this Privacy Policy.

ABSA also collects information based on your use of our services. Your web browser automatically provides us with the type of browser you are using, when you visited ABSA, your top level domain name (for example .com, .gov, .au, etc.), the address of the website that directed you here, your server’s IP address and which pages you viewed.

We will not combine information collected from your browser or device with personal information you have submitted without your prior consent. We only use this information for statistical and internal purposes including improving the functionality of ABSA’s website for our users.

From time to time, ABSA will invite you to participate in surveys. These surveys are designed to ensure that our products and services are as relevant to you as possible. ABSA will always advise if the survey is anonymous or if your participation will be linked to you in any way.

## **What do we do when we get information we didn't ask for?**

Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

## Use of personal information

ABSA will use personal information provided to it for our primary purposes and secondary purposes. By agreeing to this policy, you consent to ABSA using your personal information for the following:

### Primary purposes

1. Providing you with products and services you have ordered, or contacting you in relation to these orders
2. Answering direct enquiries
3. Informing you of new products which may be of interest to you
4. Providing customer service
5. Complying with legal obligations where necessary
6. Allowing us to run our business and perform administrative and operational tasks, such as:
  - a. training staff;
  - b. developing and marketing products and services;
  - c. risk management;
  - d. systems development and testing, including our websites and other online channels;
  - e. undertaking planning, research and statistical analysis;

### Secondary purposes

1. Billing and account management
2. Improving our products, services and websites
3. Improving our marketing and promotional efforts
4. Improving the accuracy of the personal information we hold

Personal information will not be used for any other purpose without the consent of its provider unless ABSA is required by law to disclose that information. ABSA may be required to disclose personal information to third parties in order to provide a service that you requested.

Other than in circumstances such as these, ABSA will not disclose personal information provided, such as name, address, email address or telephone number, to any organisation or person outside ABSA unless the provider has authorised ABSA to do so.

We may also use your personal information to get a better understanding of your needs. Unless you tell us otherwise, we may use this information to bring you products and services which we believe will benefit you and your business. Upon receiving new products and services for the first time, you

will be given the option to opt-out immediately of receiving future offerings of the item in question. If you are receiving promotional information from ABSA and do not wish to receive this information any longer, you may email “Unsubscribe” using our unsubscribe button.

### **Exchanging your personal information**

Generally, ABSA uses systems located within Australia. However, from time to time your information may be accessed by ABSA staff located overseas. We may also exchange your information with third parties to whom we outsource certain functions, such as data quality management and technical improvements to our databases.

Where your information is sent overseas, it is likely to be one of the following countries:

- United Kingdom
- United States
- Singapore
- New Zealand

When your information is sent overseas, ABSA will take appropriate steps to ensure data handling and security arrangements are in place in line with Australian privacy legislation.

ABSA also hosts reports on its sites which are produced, distributed or sponsored by third parties. In ordering third party content made available through the ABSA network, you are providing permission for ABSA to provide your personal information to the sponsor or third party to ensure your order can be fulfilled. ABSA will clearly indicate any third party or sponsored items listed on online retail sections across the ABSA site.

### **Direct Marketing**

You consent to ABSA using and/or disclosing any personal information collected from you for direct marketing purposes, whether collected via telephone, the Website, or otherwise, but subject to the terms of this Privacy Policy.

Unless otherwise provided in this Privacy Policy and in accordance with the Privacy Act, ABSA retains the right to use and disclose your personal information for direct marketing purposes:

1. that has been collected from you in circumstances where:
  - a. you have provided consent to do so; or
  - b. it is within your Reasonable Expectations; or
  - c. where it is impracticable to obtain your consent;
2. that has been collected from any third party in circumstances where:

- a. you have provided consent to do so; or
- b. it is impracticable to obtain your consent.

In each direct marketing communication, we will include:

1. a statement appearing on the relevant piece of marketing material notifying you of your right to Opt Out from further direct marketing communications; and
2. simple means for you to opt out of receiving further direct marketing communications of that kind.

Should you choose to opt out, we will stop using your personal information for direct marketing purposes.

ABSA will not use your sensitive information for direct marketing purposes.

### **Anonymous information**

ABSA may use anonymous information collected from you for internal purposes including improving our products and services.

Some anonymous demographic information may be provided to advertisers so they can assess whether they wish to participate in advertising or this information may play a role in the design of their advertisements for the website. All information disclosed in these circumstances will be stripped entirely of all personal information. Your personal information will not be disclosed.

### **Links to other websites**

ABSA provides links to other websites when we consider you may be interested in the content on those sites. This in no way constitutes an endorsement of those sites or their content and ABSA has no control over the conduct of the companies or organisations operating those sites. Before you disclose any personal information to such a site, we advise you to check its terms and conditions, including its privacy and security policies.

### **ABSA's use of "cookies"**

ABSA uses cookies to manage user access and subscriptions. A cookie is a small text file that a server places on your hard drive to identify that subsequent requests to a site have come from the same user. ABSA uses cookies to 'remember' your browser between page visits.

Cookies are pieces of information that a website can transfer to an individual's computer hard drive for tracking user navigation and customising site information to further improve the user experience. Cookies can make using ABSA's website easier, for example by storing

information about your preferences on a particular website. The use of cookies is an industry standard and you'll find most major websites use them.

### **Google's collection of information**

ABSA uses Google Analytics. This program utilises a cookie that collects anonymous traffic data.

ABSA uses Google's AdSense program.

- Google, as a third-party vendor, uses cookies to serve ads on this site.
- Google's use of the DART cookie enables it to serve ads to our users based on their visit to our sites and other sites on the Internet.
- You may opt out of the use of the DART cookie by visiting the Google ad and content network privacy policy.

For more details on the kind of information collected by Google [click here](#).

### **Storage and security of your details**

ABSA takes all reasonable steps to keep any information that it possesses about you is secure. We encourage you to play an important role in keeping your personal information secure, by maintaining the confidentiality of any passwords and account details used on our websites. It is your sole responsibility to maintain such confidentiality and ABSA will not be liable for any damage, loss or expense suffered due to such disclosure.

### **Accessing your information**

You can request the personal information we hold about you by contacting us by one of the methods listed at the end of this Privacy Policy. There is no fee for making such requests and we will endeavour to make your information available within 28 days of the initial request. ABSA reserves the right to confirm your identity before providing you with this information.

ABSA takes reasonable precautions to ensure that the personal information we collect and use is complete, relevant and up-to-date. However, the accuracy of the personal information we receive depends to a large extent on the information you provide. We recommend you let us know if there are any errors in your personal information by contacting ABSA.

## **Making a complaint**

If you have a concern about your privacy, you have a right to make a complaint and we'll do everything we can to put matters right.

To lodge a complaint, please get in touch with us using the contact details provided below. ABSA will review your complaint and endeavour to resolve it immediately.

We acknowledge every complaint we receive and provide contact details of the investigating officer. We keep you updated on the progress we're making towards resolving your issue.

Usually, it takes only a few days to resolve a complaint. However, if we're unable to provide a final response within 30 days, we'll contact you to explain why and discuss a timeframe to resolve the complaint.

## **Contacting ABSA**

If you have any questions or concerns with respect to this privacy policy, please contact us on:

- 07 3205 4940 between 9am and 5pm EST Monday to Friday; or
- Via email at [absa@boarding.org.au](mailto:absa@boarding.org.au)
- In writing, to:

Executive Director  
Australian Boarding Schools Association  
PO Box 5569  
BRENDALÉ DC QLD 4500  
Australia