Privacy Policy

About this Privacy Policy

Kaplan (as defined at the end of this document) appreciates that privacy is important to you.

Kaplan is committed to handling personal information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy applies to the collection, use, disclosure and other handling of personal information by Kaplan (including its schools and educational institutions).

In this policy "we" and "us" refers to Kaplan and "you" refers to any person about whom we collect personal information.

What information does Kaplan collect about you?

Students and clients

When you enrol in a course or program of study Kaplan will collect personal information about you, which may include your name, address, contact details (including your phone number and email address), date of birth, citizenship, visa details, educational history and results, work history, emergency contact details, details of your parent(s) or guardian(s) (for students who are under 18 years of age at the time of enrolment), and credit card details. We may also collect personal information which is necessary for particular products or services you request from us (for example, when you register for testing or training with Kaplan).

We will collect personal information during the course of dealing with you, for example, as you progress through a course or program of study, in connection with any welfare issue, dispute, complaint or other issue (if any) that may arise, and information about your payment arrangements, including tuition fees paid or payable, scholarships and payments by third parties.

We may collect other personal information about you which is considered sensitive information (for example, information about whether you identify as Aboriginal or Torres Strait Islander; information which may disclose your racial or ethnic origin (such as your proficiency in languages other than English); information about your health or a disability where this is relevant to accommodating your needs or responding to an incident or issue; and information that may disclose your membership of a professional or industry association (such as when assessing your eligibility for course credit or exemption)).

We may collect government related identifiers, such as your tax file number, passport number (if relevant), Confirmation of Enrolment (COE) number (or equivalent), student concession number, unique student identifier (USI), and Commonwealth Higher Education Student Services Number (CHESSN) (or equivalent), which are necessary to verify your identity, to confirm your eligibility for enrolment and/or conferral of an award or qualification, or to assess or administer your entitlement to financial assistance.

Collection of your personal information may be required by law for the purpose of reporting to Commonwealth, State and Territory government agencies for planning, evaluative, administrative, tuition protection and funding purposes. Collection of your personal information may also be required to assess your entitlement to, and administer any entitlement to, financial assistance under Commonwealth programs for supporting students such as FEE- HELP (where applicable).

We generally collect personal information directly from you. We may also collect personal information about you from third parties, for example:

- from schools and other educational institutions where necessary to verify qualifications and course credits for enrolment and assessment purposes;
- from organisations where you may be

completing a work placement, internship or practical component of your course or program of study;

- from your employer if your course or program of study is being supported by them or incorporated into your employment;
- from education agents;
- from providers of homestay, student accommodation, welfare or other support services;
- from other educational institutions and organisations that work with us recruiting potential students into our courses and programs of study;
- from other educational institutions and organisations that work in affiliation or partnership with us to provide, promote, accredit or recognise your course or program of study;
- from professional associations of which you are a member or seeking membership; or
- where we are retained by third parties to assist them with auditing and compliance programs (such as auditing and compliance programs conducted for financial planners).

We may also collect personal information about you from other 'Kaplan' entities in our group (including in New Zealand, the United Kingdom, the United States and other countries).

We may also collect personal information about you directly, from third parties or from other 'Kaplan' entities in our group for the purpose of direct marketing of our services. The use of your personal information for direct marketing purposes is discussed below.

Where it is lawful to do so, we may monitor and record your communications with us (including email and telephone) for security, dispute resolution and welfare purposes.

If you attend our premises, our security (CCTV) cameras may capture photos or video of you.

Employees, contractors and other staff

Kaplan will collect personal information about you, such as your name, address, educational history, work history, contact details (including your phone number and email address) and other information related to assessing your suitability for a position when you make an enquiry about, or apply for, a position with Kaplan. We will collect personal information about you from third parties, such as your referees, as part of our assessment of your suitability for a position. In providing contact details for your referees, you are considered to have given your consent to our collecting personal information from your referees.

Kaplan will collect certain additional personal information about you, such as your date of birth, tax file number, emergency contact details, ABN (if relevant), bank account and superannuation information, and visa, passport and licence details (if relevant), and details relating to your working with children and police checks or other pre-employment matters, if you are offered a position at Kaplan.

During the course of your employment or engagement at Kaplan, we may collect other personal information about you, including records of your work performance, medical certificates, other health or medical information, nationality, membership of a professional or industry association (if applicable), trade union membership (if applicable), information concerning your overseas health cover (if relevant) and information concerning any disputes relating to your employment or engagement.

To the extent the employee records exemption in the Privacy Act applies, this Privacy Policy does not apply to employee records relating to an employee or former employee of Kaplan.

Other individuals

Kaplan may collect personal information about individuals who are not students, clients or staff of Kaplan and its schools or other businesses.

This includes, for example, individuals who are enquiring about products or services offered by Kaplan or are dealing with Kaplan on a commercial basis (such as an education agent or other service provider or supplier). Kaplan will collect personal information about you including your name, position, address, date of birth, gender, contact details (including your phone number and email address), licence or registration numbers (if relevant), ABN, bank details and other information relevant to the capacity in which you are dealing with Kaplan.

Work health and safety

Kaplan may collect information about you from you or other persons where a work health and safety risk, incident or issue involving you is reported to us, including details of injuries, illnesses and other health information.

Visitors to our website

People can generally visit Kaplan websites without revealing who they are or providing any personal information. Kaplan will not collect any personal information about visitors to Kaplan websites, except when such visitors take steps to provide personal information to us (for example, by logging in to the website or when submitting an enquiry with your contact details). Information provided through Kaplan websites will be collected, held, used and disclosed in accordance with this Privacy Policy.

If you provide us with personal information through Kaplan websites, we may log your usage of Kaplan sites to assist us to make Kaplan websites more accessible and valuable to our students and clients.

Kaplan websites use cookies. A 'cookie' is a small text file stored on your computer which assists in managing customised settings of the website and delivering content. Kaplan websites use first party and third party cookies together to serve advertisements based on your visits to the website and third party websites.

Kaplan may use tracking technologies that collect device level information and web form provided information and third party services (including Google Analytics) to create a record to understand your interactions with Kaplan websites, undertake demographic analysis of visitors to our website and to display advertisements on third-party websites. This information is used to tailor marketing, promotional and communication activities to you. You can use the settings in your browser to control how your browser deals with cookies.

The internet is not always a secure method of transmitting information. Whilst Kaplan takes reasonable steps to ensure that information it receives is maintained securely, it cannot ensure that communications conducted via the internet will be secure.

Recordings

Students and staff may be recorded in online lectures or in-person classes, including to assist students with learning and for quality assurance.

Can you deal with Kaplan anonymously?

You have the option of not identifying yourself, or using a pseudonym, when dealing with Kaplan (for example, when making an enquiry). However, it is generally not practicable or lawful for Kaplan to deal with you anonymously or pseudonymously on an ongoing basis (for example, if you wish to enrol in and complete a course or program of study). If we do not collect personal information about you, we may be unable to provide you with the services you have asked us to provide and you may be unable to access relevant assistance.

How does Kaplan hold personal information about you?

Kaplan holds personal information about you in paper-based and electronic records and systems.

Personal information may be collected in paper-based documents and converted to electronic form for storage (with the original paper-based documents either archived or securely destroyed).

Information held in paper-based form is generally securely stored at the school at which you are enrolled or at the Kaplan head office in Sydney, Australia or in the case of archived records, at an external storage facility in Australia. Kaplan uses physical security and other measures to ensure that personal information is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure.

Information held in electronic form is generally held on servers in Australia, but some information may be held on servers overseas (for example, in the United Kingdom). To the extent Kaplan engages third parties to host or manage these servers, it has in place appropriate contractual arrangements regarding data security. Kaplan uses physical security, password protection and other measures to ensure that personal information stored in electronic form is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure.

Why does Kaplan collect and hold your personal information?

Students and clients

Kaplan collects and holds your personal information for the purposes outlined in this Privacy Policy, including to provide you with the products, services or information you have requested from Kaplan and to manage and administer the products and services we provide. Your information may be held by Kaplan after you have ceased to be a student or client to satisfy legal or regulatory record- keeping obligations or, for example, to enable Kaplan to confirm or verify your participation in or completion of a course or program.

Other individuals

Kaplan collects personal information about individuals who are not students or clients of Kaplan and its schools for the purposes outlined in this Privacy Policy, including to respond to an enquiry or administer or manage a commercial arrangement between Kaplan and the individual or third party.

How does Kaplan use and disclose my personal information?

Kaplan may use or disclose your personal information for the purposes notified to you at the time of collection, or otherwise as set out in this Privacy Policy.

We will not use or disclose your personal information for any other purpose without first obtaining your consent, except to the extent that we are permitted, authorised or required by law to use or disclose your personal information for another purpose.

Generally we will only use or disclose your personal information as follows:

- To provide the products, services or information you have requested from Kaplan, including for the purposes of enrolling you, assessing your progress, tracking your attendance, providing pastoral care (if applicable), issuing your results, and providing certificates of completion and testamurs, for your course(s) and program(s) of study. We may also disclose your information to third parties where they have been retained by Kaplan to assist us with functions such as the recruitment of students, providing student support services (including student satisfaction surveys), the placement of students into internships, work experience or employment, providing overseas student health cover to students (if applicable), promoting or recognising Kaplan qualifications, the administration of contracts or undertaking auditing or compliance programs for us.

- To register you for, and administer, events, promotions or competitions.

- To verify to third parties who make enquiries of us as to whether individuals have completed a course or program of study at one of our schools (for example, where a potential employer is verifying a qualification or claimed qualification or you are enrolling in another school or educational institution or your course or program of study is being supported by your employer or undertaken in conjunction with your current employment or where a professional association of which you are a member, or seeking membership, is verifying a qualification or claimed qualification).

- To comply with our legal and regulatory obligations, including disclosure and reporting to Commonwealth, State and Territory government agencies for planning, evaluative, administrative and funding purposes. This may include:

    - disclosure and reporting to government agencies (including State Training Authorities) for the purpose of administering entitlements to financial assistance under government programs for supporting students such as FEE-HELP (where applicable);

    - disclosure to government agencies with responsibility for administering and regulating education and training providers in Australia such as the Tertiary Education Quality and Standards Agency (TEQSA), the Australian Skills Quality Authority (ASQA), the Department of Home Affairs and the Tuition Protection Service (TPS);

    - disclosure to government agencies or government-appointed providers with responsibility for reviewing and analysing student and other stakeholder feedback, including those administering the Quality Indicators for Teaching and Learning (QILT);

    - disclosure to government agencies with responsibility for administering immigration and student visa arrangements (including disclosure of suspected breaches of student visa conditions and statistical information requested in relation to agent immigration performance); and

    - disclosure and reporting to the National Centre for Vocational Education Research Ltd (NCVER), to organisations conducting student surveys and to researchers for the purposes of facilitating statistics and research relating to education (including surveys), for understanding how the VET market operates for policy, workforce planning and consumer information, and for administering VET including program administration, regulation, monitoring and evaluation.

- To comply with work health and safety laws, including disclosure to public health authorities, regulators and other third parties in response to health and safety risks, incidents or issues such as the potential spread of infectious diseases or illnesses.

- To relevant peak bodies who may represent and assist us dealing with government agencies and other third parties.

- To assist us to make Kaplan sites, services and products more accessible and valuable to our students and clients, including in connection with a meeting scheduling tool.

- To keep your parent(s) and/or guardian(s) and education agent informed of your attendance, progress and general well-being, if you are under 18 years of age.

- To perform various administrative or management functions including administering billing and debt recovery; training of staff and contractors and

managing their work performance and career progression; quality assurance and evaluation; maintenance and testing of information technology systems; obtaining advice from consultants and professional advisers; and management of legal liabilities and claims (including liaising with legal representatives and insurers).

- To our university partners, if we have a contract with them relating to your programme of study.
- To your employer if your course or program of study is being supported by them or incorporated into your employment.
- To any education agent used to arrange your application or study with us.
- To any homestay or student accommodation provider supporting your living arrangements or any welfare service provider supporting your study with us.
- To other 'Kaplan' entities in our group as part of our global sales and recruitment activities and offshore enrolment processes (if applicable), regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise or for system maintenance support and hosting of data.
- To market or promote Kaplan, its activities or your achievements, including sharing (on social media accounts and websites of Kaplan and other 'Kaplan' entities in our group, and with education agents) testimonials, images or videos of you in connection with your studies, activities (including social gatherings), graduation or achievements at Kaplan.
- We may use artificial intelligence (AI) technologies to enhance our services and improve your experience with us. AI may assist in refining written text, analysing data, supporting document preparation and responding to your initial enquiries via chat bots. Before processing any personal information, we ensure that all AI applications comply with relevant data protection laws and regulations.

Will your personal information be used for direct marketing?

Kaplan will use and disclose your personal information for the purpose of direct marketing, including keeping you informed of products and services and new developments we consider may be of interest to you.

You may request that you not receive direct marketing communications at any time by contacting the Kaplan Privacy Officer at privacy@kaplan.edu.au or + 61 2 9908 0200.

If we have collected personal information about you from third parties, we will only use that information for direct marketing purposes with your consent (unless an exception applies). If we use your personal information in this way, we will give you the opportunity in each direct marketing communication to request not to receive further direct marketing communications.

Will your personal information be disclosed to overseas recipients?

Kaplan may disclose personal information to overseas recipients as set out in this Privacy Policy.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

The entities referred to as 'Kaplan' in this Privacy Policy are subsidiaries of Kaplan, Inc. Kaplan, Inc., its subsidiaries and affiliates have operations in North America, the United Kingdom, Europe, Middle East, Africa, China, Hong Kong SAR, North East Asia, South East Asia, Singapore,

Australia and New Zealand. In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be located in the countries or regions in which Kaplan operates.

Kaplan may disclose personal information to overseas recipients such as Kaplan, Inc., its subsidiaries and affiliates for purposes that include direct marketing. Those entities may use your personal information to keep you informed of their products and services.

Kaplan may disclose personal information to personnel or contractors located overseas to provide information technology, student support and administrative services.

How can you access or seek correction of your personal information?

Generally, if you are a student or client and have a simple enquiry about your personal information (such as confirming your current contact details, requesting a copy of your enrolment or academic records or confirming results from your course or program) please contact the Kaplan school or educational institution you enrolled with.

You are entitled to access your personal information held by Kaplan on request. To request access to your personal information, please contact the Kaplan Privacy Officer using the contact details set out below. In limited circumstances, access to your personal information may be declined in accordance with the Australian Privacy Principles. You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

Kaplan endeavours to keep your personal information accurate, up-to-date and complete. You can assist us with this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your details change. However, if you consider any personal information we hold about you is inaccurate, out-of- date, incomplete, irrelevant or misleading you are entitled to request correction of the information.

After receiving a request from you, we will take reasonable steps to correct your information.

If you wish to have your personal information removed from our records, you may request that your personal information be deleted or destroyed. It will not always be possible to comply with your request to delete or destroy your personal information (for example, records of a course or program of study you have undertaken must be retained by Kaplan for the period(s) that are specified by applicable legislative and regulatory requirements and while you are enrolled or studying with Kaplan we must hold information about you to enable us to provide and administer your course or program of study and to comply with applicable laws).

We may refuse your request to access, correct or delete your personal information in certain circumstances. If we do refuse your request, we will provide you with a reason for our decision and, in the case of request for correction, we will include a statement with your personal information about the requested correction.

What should you do if you have a complaint about the handling of your personal information?

If you have any questions or concerns about this Privacy Policy or how your personal information has been handled by Kaplan, you may contact your Kaplan school or education institution at any time.

If you have contacted us and your question or concern has not been able to be resolved to your satisfaction, you may make a complaint to the Kaplan Privacy Officer using the contact details set out below.

We will consider and respond to your complaint within a reasonable period. If you are not satisfied with our response to a complaint, or you consider that Kaplan may have breached the Australian

Privacy Principles or the Privacy Act, you are entitled to make a complaint to the Office of the Australian Information Commissioner.

The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992.

Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

How are changes to this Privacy Policy made?

Kaplan may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit this website regularly to keep up to date with any changes.

Specific privacy notices

Kaplan may also publish privacy notices from time to time that provide further information about how your personal information may be handled by Kaplan and third parties in specific circumstances.

If you are a student within the following categories, please see the corresponding privacy notice for further information:

- Domestic higher education students paying fees directly to Kaplan and studying with Kaplan Business School or Kaplan Professional – click the following link: https://www.kaplan.edu.au/wp-content/uploads/2021/08/Privacy-Notice-Up-front-Payments-Tuition-Protection-Domestic-Students.pdf

- Students studying a vocational education and training (VET) course with Kaplan Professional – click the following link: https://www.kaplan.edu.au/wp-content/uploads/2021/08/National-VET-Data-Privacy-Notice-regarding-NCVER-DESE-and-other-bodies.pdf

Definitions

Kaplan means Kaplan Australia Holdings Pty Ltd ACN 117 261 980 or any of its associated entities (as defined in section 50AAA of the *Corporations Act 2001* (Cth)), this includes:

- Kaplan Australia Pty Ltd, ABN 76 117 262 165;

- Kaplan Higher Education Pty Ltd, ABN 85 124 217 670 (prv 12030), trading as The University of Adelaide College CRICOS 03127E, trading as Murdoch College CRICOS 03127E, and operating as the University of Newcastle College of International Education CRICOS 00109J;

- Kaplan Business School Pty Ltd, ABN 86 098 181 947 (prv 12094) CRICOS 02426B;

- Kaplan Education Pty Ltd, ABN 54 089 002 371 (RTO 90116), trading as Kaplan Professional; and

- Kaplan International English (Australia) Pty Limited, ABN 31 003 631 043, CRICOS 01165D.

Contacting Kaplan

The contact details for **Kaplan's Privacy Officer** are:

Address	Kaplan Privacy Officer Kaplan Australia Pty Limited Level 12, 45 Clarence Street SYDNEY NSW 2000
Telephone	+ 61 2 9908 0200
Online	http://www.kaplan.edu.au/
Email	privacy@kaplan.edu.au

Privacy Policy Version

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