

The Great Public Schools Association of Queensland

PRIVACY POLICY (July 2024)

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Spirit of Fellowship



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GPS PRIVACY POLICY

1. INTRODUCTION

- 1.1. This Privacy Policy applies to the Great Public Schools Association of Queensland (GPS, GPSQLD, Us, We, Our) and includes any trading name or business name of GPS.
- 1.2. GPS Qld is committed to respecting the privacy of individuals. This Privacy Policy sets out how GPS Qld handles personal information. Any individual who provides Personal Information to Us consents to Us using, storing, and disclosing that Personal Information in accordance with this Privacy Policy.
- 1.3. We collect, hold, use and disclose personal information for the purpose of carrying out our functions and activities, and in accordance with the *Privacy Act 1988* (the Act) and the Australian Privacy Principles.
- 1.4. We are also required to comply with other legislation, regulations, and enactments in some circumstances, including:
 - (a) applicable data protection and privacy legislation of the other national jurisdictions in which GPS Qld operates;
 - (b) applicable Australian State and Territory health privacy legislation, for example the *Health Records Act 2009* (QLD) when we collect and handle certain health information;
 - (c) the *Spam Act 2003* (Cth); and
 - (d) the *Do Not Call Register Act 2006* (Cth).
- 1.5. This Privacy Policy is available for free on Our website at www.gpsqld.org.au or by contacting Us directly to request a copy free of charge.
- 1.6. We may revise or update this Privacy Policy from time to time by publishing a revised version on Our website. Revised versions take effect from the time published.
- 1.7. Employees and prospective employees should refer to Our Human Resources Policy, for information on the privacy of employee information and records.

2. WHY DOES GPS QLD COLLECT PERSONAL INFORMATION?

- 2.1. The Personal Information You provide is important to Us as it can be used to identify You, make it easy for Us to contact You, and to allow Us to efficiently carry out Our business functions and activities.
- 2.2. We may collect, hold, and use Personal Information of individuals to enable Us to perform our core functions, and provide various products, services, and offerings. This includes:
 - (a) verifying the identity of an individual;
 - (b) completing background checks;
 - (c) verifying an individual's compliance with any GPS Qld Rules as applicable from time to time;
 - (d) organising, controlling and administering GPS Qld competitions, programs, activities and other events relating to school sport;
 - (e) administering, managing and providing access to the GPS Qld websites or any other registration database used by GPS Qld;
 - (f) researching, developing, running, administering and marketing competitions, programs, activities and other events relating to GPS sport;
 - (g) adjudicating disputes and conducting disciplinary procedures;
 - (h) researching, developing and marketing products, services, merchandise and special offers made available by us and third parties;
 - (i) keeping interested parties informed of news and information relating to various events, activities and opportunities via various mediums;
 - (j) providing services and publications, including Our websites;
 - (k) supporting GPS Qld boards and committees;
 - (l) supporting student-athletes and student-athlete advocacy groups;

- (m) facilitating discussion of topical issues relating to School sport;
- (n) responding to emergency situations involving or requiring medical treatment;
- (o) providing information, education, training, and technical support to those that engage with Us or participate in our activities, events, programs and competitions;
- (p) sending invitations to events;
- (q) providing lobbying advocacy services on behalf of Members;
- (r) conducting market research and surveys to improve services, and analyse trends;
- (s) conducting competitions;
- (t) receiving, investigating, and taking action on complaints about employees, volunteers, member schools and Participants;
- (u) completing administration for Your interactions and transactions with Us;
- (v) complying with Our corporate governance obligations;
- (w) communicating with You during the provision of Our services;
- (x) communicating with Our related entities, network of partners, customers, and supporters;
- (y) processing payments and arranging deliveries;
- (z) tailoring Our offerings to suit the preferences of students;
- (aa) communicating offerings from us, and third party offerings;
- (bb) promoting the profile of Participants as part of Our events and competitions on Our websites; and
- (cc) Our other related activities from time to time.
(Activities and Functions)

2.3. We try at all times to only collect the Personal Information We require to enable Us to perform the particular function or activity We are carrying out.

3. ANONYMITY AND PSEUDONYMITY

- 3.1. Subject to this clause 3, when dealing with Us, You may ask not to identify yourself, and remain anonymous. Alternatively, when dealing with Us, You may use a Pseudonym, and require Us to use a Pseudonym when dealing with You, in lieu of providing Your Personal Information.
- 3.2. For Us to perform or provide You with services, Your Personal Information must be provided and must be correct and up to date so as to enable Us to verify Your identity and provide such services. This includes for example, providing Your name, contact details, and other relevant details if you are applying to be a Participant.
- 3.3. In most instances We may require You to provide Your Personal Information and are unable to deal with You in a particular manner in the absence of Your Personal Information, including where:
 - (a) We are required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves. For example, in some instances we may be required to collect such information, for the purposes of education, child protection, work health and safety laws, charitable collections and medical treatment; or
 - (b) it is impracticable for Us to deal with individuals who have not identified themselves or who have used a Pseudonym, for example We must check your photo identification and digital signature to confirm Your identity when participating in Our Activities and Functions.

4. WHAT INFORMATION DOES GPS QLD COLLECT?

- 4.1. We collect and hold Personal Information relating to a range of individuals, including: Participants, students, attendees of Our events, members of the public who have contacted Us or communicated with Us, newsletter subscribers, suppliers, sponsors, employees, prospective employees, and other individuals from time to time.
- 4.2. The information collected by GPS Qld about a particular person will vary depending on the circumstances of collection.
- 4.3. Personal Information We collect, and hold may include Your name, address, email address, phone number, date of birth, date

of enrollment, school attended, proof of identity, mailing address, other contact details, dietary and accessibility requirements, qualifications, academic results, accreditations, licenses and registrations, communication preferences, communication history, employment details, health information, sporting or athletic information (current and historical), gender, photo and credit card details. From time to time, We may collect more detailed Personal Information from You, example of which include to assist Us with Our competition and program evaluations, marketing materials and staff emergencies.

- 4.4. GPS Qld may collect and use health information provided by You to ensure that GPS Qld competitions and programs are run safely and in accordance with any special health needs participants require. Health information may also be collected and kept for insurance purposes. In addition, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government, or to plan future GPS Qld competitions, events and activities.
- 4.5. We may also collect Your opinions, comments, and other data through surveys We conduct, which are generally hosted through 'MS Forms'. You can access Microsoft Forms Privacy information at <https://servicetrust.microsoft.com/search>

5. HOW IS PERSONAL INFORMATION COLLECTED?

- 5.1. The main way We collect Personal Information about You, is when You give it to Us.
- 5.2. We may collect Your Personal Information directly from You through various means including via Our website, in person, email, fax, online and written forms, phone calls, or other forms of correspondence, writing, or recording. Examples of when We may collect Your Personal Information include when, You:
- (a) enter Your Personal Information into, or agree to having your Personal Information entered into, one of GPS Qld's online systems, including but not limited to GPSQLD.TV;
 - (b) register as a Participant;
 - (c) subscribe to Our mailing list;
 - (d) access the GPS Qld website;
 - (e) register for our newsletter subscription or any other GPS Qld publication, including electronic publications;
 - (f) provide details to Us in a competition registration questionnaire, application, consent form, survey, feedback form or incident report form;
 - (g) supply Us with goods or services;
 - (h) apply for a job with Us or are employed by Us or to volunteer with Us;
 - (i) contact Us for information on Our products or services;
 - (j) make a complaint to Us, or obtain a refund or credit;
 - (k) contact us through Our website or by another means;
 - (l) order or otherwise obtain merchandise, products, services, or information from Us or an authorised agent or licensee;
 - (m) become involved on an GPS QLD committee;
 - (n) undertake an GPS Qld education program, conference, or seminar;
 - (o) register to attend one of Our events;
 - (p) create an account on Our website;
 - (q) join GPS Qld's network;
 - (r) sponsor Us;
 - (s) become an industry expert or media contact of Ours;
 - (t) attend Our premises; and
 - (u) otherwise correspond with us by various means.
- 5.3. From time to time We may obtain Personal Information from third parties not disclosed in this Privacy Policy. When We do so, We will take reasonable steps to ensure that We make You aware of the collection of Your Personal Information in accordance with the Act.

- 5.4. Our obligation to inform You about the details of a third party may not apply in the case of formal member complaints processes. In these cases, the relevant GPS Qld Member Protection Policy will be followed.
- 5.5. We will only collect Personal Information about You indirectly from third parties if it is not reasonable or not practicable to collect the Personal Information directly from You, or where You have otherwise consented to the Personal Information being provided to Us through that third party.
- 5.6. Personal Information may also be collected where GPS Qld is required or permitted to do so by law.
- 5.7. We may collect Personal Information from:
- (a) a GPS Qld Member that assists Us in running programs, events, activities, or competitions;
 - (b) direct marketing database providers; and
 - (c) Government agencies such as the Australian Taxation Office or the Australian Securities and Investment Commission.
- 5.8. We may also collect Your Personal Information from Your authorised representative, if You have one, and will assume if someone purports to be Your authorised representative that they are authorised to provide Us with Your Personal Information.
- 5.9. We may also collect Personal Information from publicly available sources to enable Us to contact stakeholders who may be interested in Our products or services.
- 5.10. We may also collect Personal Information from third parties, which might include, without limitation, various national or state sporting bodies, Federal and State Departments of Sport, non-affiliated sporting organisations or any other government or law enforcement bodies as required by law.
- 5.11. Where We receive Personal Information about You from a third party which was not solicited, then that Personal Information will be dealt with in accordance with this Privacy Policy and the Act. Specifically, We will determine, within a reasonable period of time after receiving the Personal Information, whether We could have collected the Personal Information lawfully and fairly if We had solicited the Personal Information and only retain such Personal Information if We believe this is the case.
- 5.12. We may keep records of unsolicited Personal Information if the Act permits it (for example, if the Personal Information is reasonably necessary for one or more of Our Activities and Functions).
- 5.13. If you do not provide some or all of the Personal Information that GPS Qld requests from You, You may be prohibited from certain GPS Qld services and products, including GPS Qld activities, competitions, programs and events.

6. COLLECTION NOTICES

- 6.1. Where We collect Personal Information directly from you, We will take reasonable steps to notify You, at the time of collection, or as soon as practicable afterwards, of:
- (a) Our identity and how to contact Us;
 - (b) the purposes for which we are collecting the Personal Information;
 - (c) whether the collection is required or authorised by or under an Australian law or a court or tribunal order;
 - (d) the third parties (or types of third parties) to whom We would normally disclose information of that kind;
 - (e) whether any of those third parties are located overseas and, if practicable to specify, the countries in which they are located; and
 - (f) the fact that this Privacy Policy contains information about how to access and correct Personal Information and make privacy complaints (and how we will deal with those complaints).
- 6.2. Where Personal Information is collected on a paper form or website page, We will generally include a collection notice, or a clear link to a collection notice, on the form or website page.

7. QUALITY OF PERSONAL INFORMATION

- 7.1. We take reasonable steps to ensure that Personal Information that We collect is accurate, up to date and complete. This includes by:
- (a) recording Personal Information in a consistent format;
 - (b) where necessary, confirming the accuracy of Personal Information We collect from an individual, third party (including Members and GPS Qld Affiliates) or a public source;

- (c) promptly adding updated or new Personal Information to existing records;
- (d) regularly auditing Our contact lists to ensure accuracy; and
- (e) destroying and de-identifying Personal Information that is no longer required.

7.2. You can assist Us to keep Your Personal Information up to date by letting us know about any changes to Your Personal Information, such as your email address or phone number.

8. SENSITIVE INFORMATION

8.1. We will only collect Sensitive Information about You if:

- (a) You consent to Our collection of the Sensitive Information, and the Sensitive Information is reasonably necessary for Us to carry out one or more of Our functions or activities;
- (b) the collection is required or authorised by or under an Australian law or a court/tribunal order; or
- (c) We are otherwise permitted or authorised by the Act or at law.

8.2. Where possible, We destroy Sensitive Information after it is no longer required by Us.

8.3. The specific Sensitive Information we will collect from You may be to ensure Your health and safety, for insurance purposes and any other reason GPS Qld considers appropriate for the purpose of conducting Our Activities and Functions.

8.4. The type of Sensitive Information We may collect, includes information about Your health and medical history, nationality, dietary and mobility needs, copies of medical reports and psychiatric assessments in the course of conducting professional investigations, racial or ethnic origin, association, memberships or criminal history.

9. USE OF PERSONAL INFORMATION

9.1. We will make You aware at the time of collection of Your Personal Information, how We intend to use that Personal Information.

9.2. We will use and disclose Your Personal Information for the purposes advised to You at the time of collection and may also use and disclose Your Personal Information to enable us to perform and undertake Our Activities and Functions.

9.3. We may also make secondary use or disclosure of Your Personal Information, in addition to Our Activities and Functions, where:

- (a) You would reasonably expect Us to use or disclose the Personal Information, that is not Sensitive Information, and such secondary use is related to the primary purpose for which it was collected;
- (b) You have consented to Our use and disclosure of Your Personal Information; or
- (c) the use or disclosure is permitted or authorised by the Act, or any other Australian law or court/tribunal order.

9.4. We do not sell Your Personal Information to third parties, but it may be disclosed to third parties from time to time in order to facilitate and administer our Activities and Functions, including enabling participation in other relevant sporting competitions, programs and events.

10. USE OF GOVERNMENT RELATED IDENTIFIERS

10.1. Our policy is to not:

- (a) use a government related identifier of an individual (such as a Medicare number or driver's license number) as Our own identifier of individuals; or
- (b) otherwise use or disclose such a government related identifier unless this is permitted by the Act, or reasonably required for the performance or undertaking of Our Activities and Functions.

11. DISCLOSURE OF PERSONAL INFORMATION

11.1. We do not disclose Personal Information to other organisations unless:

- (a) We believe it is reasonably necessary to conduct Our Functions and Activities;
- (b) You give Your consent; or
- (c) it is required or authorised by law including in emergency situations or to assist law enforcement, in which case the disclosure will be conducted in accordance with the Act and relevant law, including that We will make a written note

of the use or disclosure.

- 11.2.** We may disclose Your Personal Information, that is not Sensitive Information, in order to:
- (a) manage and administer the products We provide to You;
 - (b) enable third parties engaged by Us to provide services on Our behalf, for example deliver products You have ordered, or investigate complaints;
 - (c) assist You with enquiries;
 - (d) charge You for the products We provide and collect any amounts You may owe to Us, including any debt recovery action;
 - (e) ensure that Our internal business operations are running smoothly including any reporting or legal requirements We may be required to fulfil; and
 - (f) otherwise to conduct Our Functions and Activities.
- 11.3.** We will not disclose any Sensitive Information about You, unless You have provided express consent for Us to do so, or We are required by Law.
- 11.4.** Currently, deliveries are completed for Us by Australia Post and other third party providers, such as couriers. We request that they dispose of Your Personal Information when the delivery is complete.
- 11.5.** We outsource information technology (IT) services to various providers. We require these providers to confirm their compliance with this Privacy Policy.
- 11.6.** Currently, Our online payments are processed through Strip. We recommend You consider the Strip privacy policy and other terms and conditions for any information provided through this payment service. Copies are available on the Stripe website, <https://stripe.com/au/privacy>, or by contacting Stripe directly.
- 11.7.** We may disclose Your Personal Information to third parties who are contracted by Us to carry out advisory, administrative, analytical or technical research functions for Us or Our related bodies corporate. Where We do so, We will require those third parties to comply with the Privacy Act and Australian Privacy Principles. These third parties may include:
- (a) financial institutions for payment processing;
 - (b) State and National Sporting Organisations and other service providers involved with or engaged by Us for any GPS Qld competitions, events, programs or any educational programs or other programs;
 - (c) members of GPS Qld committees (such as advisory committees, Member and discussion groups formed to consider topics of interest to the educational sport industry);
 - (d) government and regulatory bodies (such as the Australian Sports Commission, the Australian Sports Anti-Doping Authority, the Australian Institute of Sport, various national sporting bodies, Federal and State Departments of Sport);
 - (e) referees whose details are provided to us by job applicants;
 - (f) third parties who have complained about Members, GPS Qld Affiliates or Participants (including to advise them of the conduct and outcome of the complaint);
 - (g) GPS Qld's contracted service providers, including:
 - (i) electronic content delivery providers;
 - (ii) information technology service providers;
 - (iii) publishers of our newsletters and other publication materials;
 - (iv) online voting providers;
 - (v) GPS Qld competition, program and event organisers;
 - (vi) marketing and communications agencies;
 - (vii) call centres and call training centres (including the third party that conducts surveys on our behalf);
 - (viii) mailing houses, freight and courier services;
 - (ix) printers and distributors of direct marketing material;
 - (x) external business advisers (such as recruitment advisers, auditors and lawyers); and
 - (xi) transcript recording service providers, in relation to disciplinary proceedings; and

- (h) regulatory bodies as required by law;
 - (i) relevant sporting bodies, which may include the Australian Sports Commission, the Australian Sports Anti-Doping Agency, the Australian Institute of Sport, various national or state sporting bodies, Federal and State Departments of Sport, non-affiliated school sporting organisations or any other government or law enforcement bodies as required by law; and
 - (j) other enforcement bodies where We believe the disclosure is reasonably necessary to an enforcement related activity.
- 11.8.** In the case of these contracted service providers, We may disclose Personal Information to the service provider and the service provider may in turn provide Us with Personal Information collected from You in the course of providing the relevant products or services.
- 11.9.** We may disclose Personal Information to overseas parties, in the following situations:
- (a) using secured cloud services from time to time, the location of which is not reasonably available;
 - (b) providing Your details to an overseas direct mail provider to send marketing material to You;
 - (c) providing information to Members, GPS Qld Affiliates or Participants to advise them of complaints made against them and to seek responses from them; or
 - (d) disclosing information to disciplinary tribunals to consider complaints.
- 11.10.** In each case, Our policy is to comply with the requirements of the Act that apply to cross border disclosures of Personal Information, as well as with any legal requirements applicable in the relevant jurisdiction.
- 11.11.** Where in future We are required to disclose Personal Information to other third parties not disclosed in this Privacy Policy, We will require those organisations to comply with the Act and the APPs when We disclose Personal Information to it.
- 11.12.** If We disclose Personal Information to overseas parties, We will take such steps as are reasonable to ensure that any overseas recipient does not breach the Australian Privacy Principles in relation to the Personal Information and otherwise comply with Australian Privacy Principle 8.

12. SECURITY AND STORAGE OF PERSONAL INFORMATION

- 12.1.** We take reasonable steps to protect the Personal Information We hold from misuse, interference and loss and unauthorised access, modification, or disclosure.
- 12.2.** Information may be securely stored in hard copy or electronic format in facilities that We own and operate, or that are owned and operated by Our service providers.
- 12.3.** Information collected in hard copy, such as forms completed at Our competitions and events is either digitised for secure electronic storage then destroyed, or where appropriate destroyed once the request has been processed.
- 12.4.** If We engage service providers or third parties to perform services for Us, We will endeavour to require them to comply with Our Privacy Policy.
- 12.5.** Our employees, contractors, and third-party service providers are required to ensure that Personal Information they are privy to is not divulged, except under appropriate circumstances. They are required to ensure that any such Personal Information available to them is protected from theft, damage, loss, unauthorised access and any other form of abuse or improper use.
- 12.6.** Improper use or suspected improper use of Personal Information will result in appropriate disciplinary action being taken.
- 12.7.** Our electronic databases are secured by a firewall and anti-virus software to ensure, so far as practicable, that it is not accessed by unauthorised parties. Our website has security measures designed to protect against loss, misuse, or alteration to Your Personal Information under Our control.
- 12.8.** We use EFTPOS and online technologies to process payments to ensure that all transactions meet industry security standards to ensure payment details are protected. Any payment information we stored is encrypted, masked and de-identified.
- 12.9.** We conduct regular internal and external audits to assess the suitability of Our security measures.
- 12.10.** All unencrypted information exchanged via the internet may be accessed and used by people other than those for whom it is intended. If You provide Us any Personal Information by email or online, you do so at Your own risk.
- 12.11.** You can help to protect the privacy of your Personal Information by keeping passwords secret and by ensuring that you log out of the website when you have finished using it. In addition, if You become aware of any security breach, please let Us know as soon as possible.
- 12.12.** Once We no longer have a need for Your Personal Information then We will destroy the Personal Information when it is reasonably practicable to do so.

12.13. If You wish to have Your Personal Information removed from Our database, We will take reasonable steps to comply with Your request unless We need to keep the information for legal, auditing or internal risk management reasons.

13. MARKETING

13.1. Where We have collected Your Personal Information directly from You, We may use or disclose Your Personal Information, for the purposes of Direct Marketing if:

- (a) the Personal Information is not Sensitive Information;
- (b) You would reasonably expect that Your Personal Information would be used for the purposes of Direct Marketing; and
- (c) You have not advised Us that You do not want Your Personal Information to be used for the purposes of Direct Marketing.

13.2. We may collect Personal Information from someone other than You for the purpose of Direct Marketing, where:

- (a) the Personal Information is not Sensitive Information;
- (b) You have consented to the disclosure of Your Personal Information for that purpose; and
- (c) You have not advised Us that You do not want Your Personal Information to be used for the purposes of Direct Marketing.

13.3. If we have collected Personal Information from someone other than You for the purpose of Direct Marketing, You can ask Us to provide you the source of the Personal Information. Our policy is to do so unless it is unreasonable or impracticable.

13.4. We may disclose Your Personal information, that is not Sensitive Information, to a third party for the purpose of it conducting Direct Marketing, provided it is conducted in accordance with Australian Privacy Principle 7.3.

13.5. Where Your consent is impractical to obtain, We may use or disclose Your Personal Information in accordance with Australian Privacy Principle 7.3 and the below clause 13.7.

13.6. We may collect and use Your Personal Information for the purpose of Direct Marketing, if We enter a service provider contract with the Commonwealth which directly or indirectly obliges us to do so.

13.7. In any Direct Marketing, We will provide a clear and simple means by which You may easily request, free of charge, not to receive direct marketing communications from Us.

13.8. Alternatively, You can update Your communications preferences, (including opting out of participating in surveys), free of charge:

- (a) for previous Participants, when registering for a new competition or event
- (b) by sending a letter to: GPS Qld, PO Box 465 Spring Hill QLD 4001 or an email to admin@gpsqld.org.au; and
- (c) if You receive a marketing call, by advising the caller that You no longer wish to receive marketing calls.

13.9. This clause 13 is subject to the operation of other Direct Marketing legislation including the *Do Not Call Register Act 2006* (Cth) and the *Spam Act 2003* (Cth), and any other applicable Commonwealth legislation, regulation, or enactment.

14. ACCESS TO PERSONAL INFORMATION

14.1. Under the Australian Privacy Principles, You have a right to access Your Personal Information held by Us, unless a permitted exception exists at law.

14.2. We will request that You verify Your identity, before We provide You with access to Your Personal Information.

14.3. We may refuse to provide You with access to Your Personal Information, or to provide access in the manner You have requested, if:

- (a) We reasonably believe doing so would pose a serious threat to the life, health or safety of any individual, or to public health or safety;
- (b) giving access would have an unreasonable impact on the privacy of other individuals;
- (c) the request is frivolous or vexatious;
- (d) the Personal Information relates to existing or anticipated legal proceedings between Us and You, and would not be accessible by the process of discovery in those proceedings;
- (e) giving access would reveal the intentions of Us in relation to negotiations with You in such a way as to prejudice

those negotiations;

- (f) giving access would be unlawful;
 - (g) denying access is required or authorised by or under an Australian law or court/tribunal order;
 - (h) both of the following apply:
 - (i) We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Our functions or activities has been, is being or may be engaged in; and
 - (ii) giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
 - (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body;
 - (j) giving access would reveal evaluative information generated within Our organisation in connection with a commercially sensitive decision-making process; or
 - (k) We are otherwise permitted or authorised to refuse at law.
- 14.4. If We refuse to provide You access to Your Personal Information, We will provide You with written notice that sets out Our reasons (other than to the extent it would be unreasonable to do so) and inform You of the mechanisms available to complain about the refusal. If You would like to access the Personal Information that We hold, please make a request directly to Us using the contact details provided in clause 21 of this Privacy Policy. We will provide You with access to Your Personal Information, within a reasonable period after the request, and in a way that is reasonable in the circumstances, unless exempted by the Act.
- 14.5. We may charge a reasonable fee for providing You with access to Your Personal Information, which will be confirmed at the relevant time.

15. CORRECTION

- 15.1. We take reasonable steps to ensure that the Personal Information We collect, hold, use and disclose is complete, accurate and relevant.
- 15.2. We will correct or update Your Personal Information if You request that We do so, or if We are otherwise satisfied that the Personal Information We hold is inaccurate, out of date, incomplete, irrelevant, or misleading.
- 15.3. If We correct Your Personal Information after We have disclosed it to a third party who is also subject to the Act, We will only inform that third party of the corrected details at Your request. If You do request that We inform that third party of the correction, We will take reasonable steps to do so at no cost, unless this would be unreasonable, impracticable, or unlawful.
- 15.4. If We refuse to correct Your Personal Information:
- (a) We will provide You with written notice in a reasonable timeframe that sets out Our reasons (other than to the extent it would be unreasonable to do so) and inform You of the mechanisms available to complain about the refusal; and
 - (b) if You request Us to do so, We will associate with Your Personal Information a statement that You believe the Personal Information is incorrect and the reason why.
- 15.5. If we refuse to correct Your Personal Information, you may request that We make a record of Your claim that the Personal Information is inaccurate, out-of-date, incomplete, irrelevant, or misleading. We will take reasonable steps to associate the record in such a way that will make it apparent to users of the Personal Information.
- 15.6. You can contact Us if you would like to correct the Personal Information that We hold about You. We may ask You to verify Your identity before processing any correction requests, to ensure that the Personal Information we hold is properly protected.

16. WEBSITE

- 16.1. We may collect Personal Information through Our websites, including when You become subscribe to Our newsletter list, contact us about a service, event, program, competition, activity or set up an account.
- 16.2. We may also collect the following information through Our websites, either ourselves or through Google Analytics (which is hosted by a third party):
- (a) Your computer or device's IP address (collected and stored in an anonymised format);
 - (b) device screen size;
 - (c) device type, operating system and browser information;
 - (d) geographic location (country only);

- (e) referring domain and out link if applicable;
 - (f) search terms and pages visited (clickstream data); and
 - (g) date and time when website pages were accessed.
- 16.3. Our websites may also transfer cookies on computers and devices that access Our websites for record-keeping purposes. You may be able to change Your browser preferences to reject all cookies before accessing Our websites.
- 16.4. We will treat any Personal Information collected through Our websites in the same way as other Personal Information we collect.

17. LINKS TO OTHER WEBSITES

- 17.1. Our websites may contain links or references to other websites or organisations. We are not responsible for the privacy practices or content of the linked web sites and other pages hosted by Us on behalf of non-GPS Qld organisations.
- 17.2. Third party websites may have their own privacy and security policies, which we encourage You to read before supplying any Personal Information to them.
- 17.3. Links to third party websites are provided for information, and do not indicate Our endorsement of that business or any assurances about the content on that site.

18. SOCIAL MEDIA AND NETWORKING

- 18.1. We use social media networks, including Facebook, LinkedIn, Instagram, Snapchat, and Twitter, to communicate with the public. When You communicate with Our social media platforms, We may collect Your Personal Information, for the purpose of using it to communication with You and the public. The social media webpages may also collect, use and hold Your Personal Information, for its own purpose. We recommend You consider the Privacy Policies of these social media websites prior to using the same.
- 18.2. These social media websites may store Your Personal Information overseas.

19. COMPLAINTS

- 19.1. Any issues or complaints in relation to the collection, use, disclosure, quality, security of, access to and correction of Your Personal Information should be made to Us directly, via the contact details provided in clause 21 of this Privacy Policy.
- 19.2. We will respond to Your complaint within a reasonable period, and in the first instance, Our Privacy Officer will endeavour to take any steps necessary to resolve the matter within five business days.
- 19.3. If Your complaint can not be resolved at the first instance, We will ask You to complete a Privacy Complaint Form, annexed to this Privacy Policy, which details:
- (a) the date, time and circumstances of the matter that You are complaining about;
 - (b) how You believe Your privacy has been interfered with; and
 - (c) how You would like your complaint resolved.
- 19.4. We will endeavour to acknowledge receipt of the Privacy Complaint Form within five business days of receiving it, and to complete our investigation into Your complaint in a timely manner. This may include, for example, gathering facts, locating and reviewing relevant documents, and speaking to relevant individuals.
- 19.5. Our response to the Privacy Complaint Form will set out:
- (a) whether in the Privacy Officer's view there has been a breach of this Privacy Policy or any applicable privacy legislation; and
 - (b) what action, if any, GPS Qld will take to rectify the situation.
- 19.6. If We are unable to resolve Your complaint or You are unhappy with the outcome, You may be able to lodge a complaint with the relevant regulator, such as the Office of Australian Information Commissioner via its enquiries line on 1300 363 992, or via its website at <http://www.oaic.gov.au>.

20. RETENTION OF PERSONAL INFORMATION

All Personal Information that has been collected from you will only be kept for a limited duration that is relevant to the purpose for which your Personal Information is to be used and for as long as required by applicable law.

21. CONTACT DETAILS

If You would like to request access to or amend Your Personal Information, would like to make a complaint regarding Our conduct in relation to Your Personal Information, or have any general enquiries in relation to Your Personal Information, please contact Us via the following details:

The Privacy Officer GPS Qld

Mail: PO Box 465 Spring Hill QLD 4001

Phone: (07) 3214 5441

E-mail: admin@gpsqld.org.au

22. DEFINITIONS

In this Privacy Policy the following words have the following meaning:

- a) **"Act"** means the *Privacy Act 1988*(Cth);
- b) **"Activities and Functions"** as defined in clause 2.2;
- c) **"Australian Privacy Principles"** means the privacy principles set out in Schedule 1 of the Act;
- d) **"Direct Marketing"** means the use or disclosure of Personal Information for the purposes of communicating directly with an individual to promote goods or services;
- e) **"Member"** means a member of GPS Qld, **"Members"** has a corresponding meaning;
- f) **"Personal Information"** has the same meaning as in the Act;
- g) **"Privacy Complaint Form"** means Annexure A to this Privacy policy;
- h) **"Privacy Policy"** means this document;
- i) **"Pseudonym"** means a name, term or descriptor that is different to an individual's actual name;
- j) **"Participants"** means any person who attends an educational institution of a Member or GPS Qld Affiliate and who enroll to participate in a GPS Qld activity, program, event or competition;
- k) **"Sensitive Information"** has the same meaning as in the Act;
- l) **"GPS Qld Affiliate"** means an educational institution which is not a Member and includes, but is not limited to, other QLD State and independent schools, private colleges or any other secondary educational provider which collaborate with GPS Qld from time to time;
- m) **"GPS Qld Rules"** means any and all policies and guidelines of GPS Qld;
- n) **"Us"** means together the Great Public Schools Association of Queensland (GPS Qld), and all other related entities **"GPS Qld"**, **"Our"**, **"We"** has a corresponding meaning; and
- o) **"You"** means a person to whom this Privacy Policy applies and **"Your"** has a corresponding meaning.

23. EVALUATION

As part of a continuous improvement system this Policy shall be reviewed annually, upon recommendation following review by senior management in consultation with staff or following changes to relevant legislation.

Version Control	Date	Approved By	Amendments
GPS Qld Privacy Policy	6 September 2018	Jodie Watson	First version

ANNEXURE A - GPS QLD PRIVACY COMPLAINT FORM

Please direct complaints to: **The Privacy Officer**, GPS Qld Australia Limited

Mail: PO Box 465 Spring Hill QLD 4001

Phone: (07) 3214 5441

E-mail: admin@gpsqld.org.au

Complainant Details

First name

Last name

Preferred contact method (you must provide at least one contact method)

Phone

Email

Address line 1

Address line 2

Suburb/City

State

Postcode

Representative

Do you have someone that you would like to represent you in your complaint?

Yes

No

If yes:

What is your representative's relationship with you? (for example, your lawyer)

Representative's first name

Representative's last name

Representative's organisation (if applicable)

Representative's preferred contact method (you must provide at least one contact method)

Phone

Email

Address line 1

Address line 2

Suburb/City

State

Postcode

Your Complaint

Please describe how you believe your privacy has been interfered with. It will assist us if you can explain:

- What happened
- When it happened (including dates)
- What personal information of yours was affected
- Who did it (include names of individuals involved if known)
- How and when you found out about it.

The clearer your explanation is the more easily we will be able to assist you.

Please feel free to attach additional information.

Please list any other person or organisation that your complaint relates to

Please list any other person or organisation you have complained to regarding this issue

Resolution

What outcome are you seeking?

Privacy Complaint Form Collection Notice

The Great Public Schools Association of Queensland (**GPS Qld**), collects the personal information on this form for the purpose of processing and addressing your complaint. If the requested information is not provided, or any additional information we reasonably request, GPS Qld may not be able to adequately investigate and deal with your complaint.

If you have nominated a representative, GPS Qld may collect your personal information from that nominated representative. GPS Qld may also collect personal information about you from other third parties relevant to the subject of your complaint.

GPS Qld's Privacy Policy contains information about how you may:

- (a) seek to access or correct the personal information GPS Qld holds about you; and
- (b) complain about a breach of GPS Qld's privacy obligations and such a complaint will be handled.

GPS Qld may disclose the personal information collected in this form to:

- (a) any other entity or party that you have complained about or to;
- (b) the Office of the Australian Information Commissioner, or a similar regulatory body, for the purpose of aiding investigations, or defending claims made against GPS Qld in relation to the conduct of its privacy obligations; and

All personal and sensitive information is held by GPS Qld in accordance with its Privacy Policy.

Please sign and date this form

Signature

Date