



Privacy and Confidentiality Policy

Document Number | RIS-POL-001

This policy is issued by the Curijo Board in accordance with the Curijo Constitution. This policy applies to:

- Directors of Curijo
- all Curijo staff and contractors
- other individuals or organisations that use or manage Curijo resources

Related Documents

Document Title	Curijo Values
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Document Control Information

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Introduction

Background

This Privacy Policy is in accordance with the Australian Privacy Principles (“APPs”) and it governs the way your personal information is handled after that information is collected through the website curijo.com.au “Website”. The Website is operated by Curijo Pty Ltd ACN 609 893 021 (“Curijo”).

Any reference to “we”, “our” or “us” in this document means a reference to Curijo. Any reference to “you” or “your” means a reference to the user of the Website and/or a person whose personal information is collected through the Website. This privacy policy is published on the Website and, as a condition of your use of our Website, you agree to this Privacy Policy.

Key Principles

This document must:

- Be approved by the Board
- Align to the Curijo values
- Establish the tone at the top for governance and culture.
- Be Principles based.

Responsibilities

Who	What
Board	<ul style="list-style-type: none">• Approves this policy
Chief Executive Officer	<ul style="list-style-type: none">• Prepares, oversees and maintains this policy
Director’s, Employees and sub-contractors	<ul style="list-style-type: none">• Adheres to the policy• Advises the Chief Executive Officer of suggested deficiencies or improvements for the policy

External Code or Legislation

- Australian Privacy Principles

PERSONAL INFORMATION

How we collect personal information

How we collect personal information about you will depend on our relationship or interactions with you. Most of the personal information we collect and hold about you is from your direct dealings with us. We may sometimes collect your personal information other than from you directly. For example, from other suppliers who, in common with us, have a relationship with you. The website may contain external links; these are links to third-party websites. By clicking on such an external link, the website user will be taken to another website, owned by the third party.

How we use personal information

Personal information includes the information specific to you and you can think of it as personal information that is the kind of information that identifies you and relates to you such as your details and other information. We may use your personal information for the following purposes:

- Offering you the products and services;
- Recording for internal business and other purposes;
- Contacting you including for marketing purposes;
- Helping to better understand and satisfy our customer's needs;
- Giving information to third parties for example to fulfil your service and product and other needs if required or as might be disclosed to you from time to time; and
- Using for other purposes not prohibited by law and including where you have given consent to do so.

When we collect personal information about you, we do so by making a record of it.

We do this when you visit our Website and/or when:

- Registering with us, for example when you are creating an account;
- Communicating with us online and when you send or submit those communications;
- You buy a course on our website and subsequently register as a user on our Learning Management System (LMS)
- Your employer buys a seat for you on a course provided by us, and registers you as a user on our LMS

A range of digital and online services are used by us including websites, Learning Management Systems, email, online advertisements, and social media profiles for the purposes of when we provide information and services. We may operate these services and to provide a consistent experience or personalised experience for times when you use each of those services and also when providing targeted marketing.

Disclosure of personal information

The personal information that we collect, hold and use is done by us mainly to sell and promote goods and services to you and to improve on the range of our offerings. There are other reasons and/or additional reasons as well, for example:

- Promoting goods and services to you in certain ways to be of most interest to you and some of these goods and services might be from our suppliers and other trusted partners;
- Investigating your complaints and enquiries which you might make from time to time;
- Disclosing personal information when we collect the personal information from you and in connection with purposes relating to the sale and promotion of our goods and services to you.
- We are required by law in some situations; and
- Your personal information might be disclosed when there is other lawful purposes requiring disclosure.

We consider you have consented to this policy when you provide your personal information to us.

Controlling personal information

At all times you can remember that you have a choice about choosing not to provide your personal information to us.

We agree to give you access to your personal information we hold (except in limited circumstances recognised by law) upon your written request. If you would like to make any such request please contact us via the Website and/or via the contact details set out in this document.

Please contact us if you need to correct your personal information and you may also be able to correct your personal information through the Website.

If you would like to restrict the collection of your personal information, please contact us so as to make this request. You may or may not choose to provide reasons for any such request.

If you subscribe or otherwise have been added to a marketing or email list database, you may unsubscribe by means we make available or otherwise you can contact us to do so via the details set out in this document.

Your personal information is not likely to be given or disclosed to anybody that is outside of Australia, unless otherwise informed in writing. You can contact us if you have any queries about such disclosure.

How we deal with Complaints

If you have any concerns or if you choose to complain about any breach you may contact us. In contacting us in regard to any complaint, please put your complaint in writing and to provide details about it. We may discuss your complaint with our personnel and our service providers and others as appropriate.

After we receive a complaint, we will respond within five (5) days and let you know the person that is handling your complaint. We will then aim to resolve your complaint within ten (10) days. We will let you know how long it will take throughout the process.

If required, we will liaise with third parties about your complaint and make a decision which will be notified to you. Complaints can also be brought directly by you to the Office of the Australian Privacy Commissioner and you can contact them through their website www.oaic.gov.au or by telephone on 1300 363 992.

CURIJO WEBSITE

Policy

Security Mechanisms

Whilst we maintain all appropriate security mechanisms there is always a risk with respect to information use and/or abuse on the Internet. Likewise, no information communicated via the Website can be absolutely secure and you need to exercise caution with respect to your personal information disclosed over the internet and/or our Website.

Please note we cannot be held liable for the protection and the privacy of information when visiting third-party websites. Therefore, website users should exercise caution when visiting third-party websites and verify if that website is governed by a legal privacy statement that protects their personal information.

Cookies on our website

There are cookies on our Website. A cookie is a piece of information that allows the server to identify and interact more effectively with your device. The cookie assists us in maintaining the continuity of your browsing session (e.g. to maintain a shopping cart) and remembering your details and preferences when you return. Other technologies may be used which may operate in conjunction with cookies. For example, on the Website we may have Flash local stored objects and JavaScript. Further, there are instances where these cookies and other technologies are developed for internet purposes. You can configure your web browser to reject and delete cookies and block JavaScript, so you might like to consider this as an option. Another thing to understand is that you can control your preferences regarding Flash local stored objects online.

We may use Cookies on our Website. We may use Cookies to identify which pages are being used, to improve our website and for other lawful purposes from time to time. We may use web beacons on the Website.

Personal information we hold is generally stored in computer systems. The systems we use do record a variety of information in relation to interactions with our online services. These may be operated by us or by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, misuse or wrongful alteration of, personal information.

Cookies and third-party websites

Our Website may include links and information to other websites that may or may not be owned by us. Personal information disclosed to third party websites that we do not have control of is not our responsibility. Those third-party websites are not subject to this policy. It is on that basis you need to exercise care and caution on third party

websites, and you need to be sensible when giving your personal information and wherever possible read all privacy policies including on third party websites before giving any personal information.

DATA BREACH RESPONSE PLAN

Background

A data breach occurs when personal information is lost or subjected to unauthorised access or disclosure. This response plan is intended to enable Curijo to contain, assess and respond to data breaches quickly and to help mitigate potential harm to affected individuals.

Policy

The data breach response plan consists of six steps:

1. Record the breach

If any Curijo personnel becomes aware of an actual or suspected data breach, they must report it as soon as possible. Curijo Staff should immediately:

- Record the details of the data breach in the Data Breach Report Form provided in RIS-TMP-004 Data Breach Report;
- provide a copy of the Data Breach Report to their Practice Manager either in person or by email; and
- otherwise keep the incident confidential except where it is necessary to disclose information about the incident in accordance with this Plan.

2. Assess severity

The Practice Manager is responsible for taking immediate action to contain the breach and remediate harm, including by seeking assistance from the appropriate business units or external suppliers as necessary. Once the Practice Manager has reviewed the Data Breach Report and undertaken their preliminary investigation to confirm the incident, they must make an initial assessment of:

- whether the reported incident is not a data breach (such that further investigation is not required);
- whether the reported incident is a data breach (such that a further investigation is required); and
- if there is a data breach, give an initial risk rating having regard to relevant issues including (if known):
 - number of individuals affected by the breach or suspected breach;
 - type of personal information;
 - likelihood of serious harm to affected individuals;
 - the breach or suspected breach indicates a systematic problem in the company's processes or systems;

- media or stakeholder attention as a result of the breach or suspected breach;

If during this phase, the Practice Manager determines the data breach to be an eligible data breach, Curijo must give notification to the OAIC and all affected individuals about the data breach.

3. Invoke remediation

The Practice Manager may co-opt additional members to form the Data Breach Response Group or engage external providers to assist in containment or investigation of the breach, depending on the nature or severity of the data breach. The Data Breach Response Group should determine the containment and/or remediation steps to take within thirty (30) days of the date that the data breach occurred.

4. Report on outcome

The Data Breach Report and the results of the preliminary investigation (including any containment and/or remediation steps taken) must be completed within thirty (30) days of the date that the data breach occurred.

5. Advise breach reporter of outcome

The Practice Manager or a nominated member of the Data Breach Response Group must prepare a draft notification to affected individuals and the reporter of the breach.

6. Capture in the quarterly Board report

The Practice Manager must keep records of all steps taken in response to the data breach and decisions made in connection with it. This includes:

- keeping a record of all steps taken during the preliminary investigation and subsequent assessment of the reported data breach; and
- ensuring that any relevant evidence of the data breach (such as computer imaging, forensic investigation or other investigative processes) is preserved and stored securely.

The information may be required by forensic investigators, legal advisors, law enforcement and regulators, as well as for use in preparing notifications to and communications with affected individuals and the OAIC and any other regulator or relevant entities.

UPDATING THE POLICY

We reserve our rights to update and amend this privacy policy and this privacy policy is current at the date stated in the document below.

Contact Us

Contact us in respect of this Privacy Policy or about any questions you might have about your personal information and us or our use of it. Our contact details are as follows:

Address: Unit 3 Molonglo Mall
105 Newcastle Street
FYSHWICK ACT 2609

Postal Address: PO Box 853
FYSHWICK ACT 2609

Website: <https://curijo.com.au/>

Telephone: 02 6285 4802

Email: info@curijo.com.au

You may contact us if you would like to access the personal information we hold about you or if you would like any of that information corrected from time to time.

Jurisdiction

This Privacy Policy is governed by the laws as they apply in Canberra, Australia. In the event of a dispute you agree to submit to the exclusive jurisdiction of the courts as it applies in that jurisdiction.

More Information

More information about privacy law and privacy principles is available from the Privacy Commissioner. The Privacy Commissioner may be contacted at www.oaic.gov.au (email-enquiries@oaic.gov.au) (Australia).