



androgogic



Androgogic Privacy Policy





Project Documentation Information

Document Location

This document is stored in the Androgogic Repository.

Revision History

| Version | Updated by | Revision date | Summary of changes |
|---------|------------------------|---------------|-----------------------------------------------------------------------------------------------------|
| 1.0 | Androgogic team review | 19/07/2015 | Policy formalised: transposed privacy statement to a formal policy document format |
| 1.1 | Alexander Roche, CEO | 27/05/2016 | Currency review, minor updates only |
| 1.2 | Alexander Roche, CEO | 10/01/2017 | Currency review, minor updates only |
| 1.3 | Androgogic team review | 07/01/2019 | GDPR updates imported |
| 1.4 | Josephine Chan | 16/04/2019 | Minor changes (e.g. updated links e.g. wiki Privacy Policy; Androgogic Information Security Policy) |
| 1.5 | David Drinkwater | 17/04/2020 | Fixed broken and changed links |

Approval

| Version | Approved by | Revision date | Notes |
|---------|----------------------|---------------|------------------|
| 1.0 | Alexander Roche, CEO | 25/07/2015 | Version approved |
| 1.1 | Alexander Roche, CEO | 27/05/2016 | Version approved |
| 1.2 | Alexander Roche, CEO | 10/01/2017 | Version approved |
| 1.3 | Alexander Roche, CEO | 07/01/2019 | Version approved |





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1. What is a Privacy Policy?

A **privacy policy** is a statement or a legal document (in **privacy law**) that discloses some or all of the ways a party gathers, uses, discloses, and manages a customer or client's data. It fulfills a legal requirement to protect a customer or client's **privacy**. **Personal information** can be anything that can be used to identify an individual, not limited to but including name, address, date of birth, marital status, contact information, ID issue and expiry date, financial records, credit information, medical history, where one travels, and intentions to acquire goods and services. In the case of a business it is often a statement that declares a party's policy on how it collects, stores, and releases personal information it collects. It informs the client what specific information is collected, and whether it is kept confidential, shared with partners, or sold to other firms or enterprises.

Source: https://en.wikipedia.org/wiki/Privacy_policy

2. Policy

2.1 High level approach to good privacy practice

Androgogic seeks to maintain the privacy of individuals wherever possible and will not collect and/or disseminate private information unless there is a clear reason to do so.

Androgogic is also committed to adhering stringently to Australian Privacy Legislation.

To achieve these ends, Androgogic is committed to:

- maintain and keep up-to-date (this) Privacy Policy
- conform to Australian Privacy legislation and follows the Australian Privacy Principles
- Only collect and store private information that is needed
- promote good privacy management practices in our users
- encourage good privacy management in our staff community
- identify and manage privacy risks
- engage regularly, openly and honestly with our client-partners on their views and concerns and feed these into our privacy management and decision making processes
- develop partnerships that promote good privacy management practices
- work with those involved in the development of our products and delivery of our services to improve their understanding of and ability to maintain privacy and adhere to privacy legislation
- regularly review our performance and report on progress





2.2 Privacy statement

2.2.1 Scope

Androgogic collect personal information as part of:

- our delivery of Educational Technology infrastructure and services
- the employment of Androgogic staff and contractors
- the engagement of suppliers

Where Androgogic collects personal information on behalf of our client-partner institutions, we refer requests and issues relating to privacy to that partner-institution. We do however work with our client-partners to ensure that:

- good privacy management practices are being followed
- privacy risks are identified and managed
- they improve their understanding of and ability to maintain privacy and adhere to privacy legislation

Androgogic is committed to adherence to all relevant Privacy Law and related principles. This includes Australian Federal and State Government legislation and the European Union's General Data Privacy Regulation (GDPR) as relevant to the individual installation and user access and/or origin.

2.2.2 Collection of personal information

It is Androgogic's policy that we will collect and store on such personal information as is required to:

- deliver the Educational Technology infrastructure and service our client-partners require (on a client-by client basis)
- employ and manage our staff and contractors
- engage and work with our suppliers

This information is generally restricted to information allowing:

- contact such as name, address, email and phone number
- identification and reporting such as Employee Number or Student Number or TFN for employees and so on

2.2.3 Disclosure (sharing)

It is Androgogic's policy to NOT DISCLOSE personal information we have collected unless it is required by Australian law or other mandated process such as payment information for employees for taxation purposes.

Where Androgogic systems have collected personal information on behalf of client-partner institutions (such as e.g. a university or corporation or government department), it is Androgogic's policy and generally also a contracted requirement to NOT DISCLOSE personal information. It should be noted that each client-partner of course has access to that personal information and that you should consult with that institution if you have concerns or wish to





check their privacy policies and practices.

Androgogic will NOT DISCLOSE personal information overseas unless that disclosure complies with the Australian Privacy Principles (and specifically APP 8 - Cross-border disclosure of personal information).

2.2.4 Rights and choices

It is Androgogic's policy to respect the rights of an individual to have accurate, up-to-date and complete personal information stored when stored at all. To this end Androgogic will use its best endeavours to correct any incorrect information when requested to do so by the person affected (Please refer to the contact details section below).

2.2.5 How to make a complaint

If you have a complaint relating to privacy that you would like addressed, please send an email to complaints@androgogic.com and it will be addressed in a timely manner.

2.2.6 Contact details

For any requests as to privacy including requests for changes to personal information or other issues, Androgogic may be contacted at:

Telephone: 1800 987 757

Web: <https://androgogic.com/contact>

Email: support@androgogic.com

3. Resources

Key reading resources associated with this policy are as follows:

- The [Privacy Act 1988](https://www.legislation.gov.au/Series/C2004A03712) (Privacy Act): <https://www.legislation.gov.au/Series/C2004A03712>
- Australian Privacy Principles: <https://www.oaic.gov.au/privacy/australian-privacy-principles/>
- GDPR: <https://gdpr.eu/>

