

Privacy and Policy Procedure

Policy

Q-riims is committed to protecting employee and client privacy and confidentiality in line with State and Federal Privacy legislation. This policy focuses on Q-RIIMS commitment to protecting the privacy of its clients, and outlines the various ways in which it ensures this protection.

Purpose

Personal information is information or an opinion that identifies an individual or allows their identity to be readily identified from such information. It includes but is not limited to information such as a person's name, address, financial information, marital status or billing details.

PROCEDURE

1.1 Collection of personal information

Q-RIIMS collects, holds and uses personal information and records for the purposes contained herein but specifically to support the work that it is engaged by the client to undertake (submit applications or enquiries for training), keep clients up to date with changes and to facilitate the transmission of quotes, training requirements, contractual arrangements and payment processing.

Q-RIIMS only collects information as and when required by requesting it to be submitted by the individual with their consent in writing (this consent may be in the form of an enrolment enquiry or payment). Information can be collected by through:

1. Physical hard copy;
2. Electronic submission via:
 - a. Enquiry
 - b. Text
 - c. Email
 - d. Facsimile
 - e. Q-RIIMS family of websites including social media sites
 - f. Promotions, Open Days and exhibitions.

Q-RIIMS collects personal information from clients in order to process enrolments and obtain the information required to provide suitable training services. Where applicable information may also be required to populate Salesforce or comply with our IMS and populating Salesforce.

1. Information collected includes general personal details, and may include details of any disability or health issue that may affect the student's ability to undertake training and/or assessment activities.
2. Q-RIIMS will only collect personal information that is required for the purposes of our IMS.
3. Q-RIIMS collects all personal information in writing, either from an email, or directly from the person whom the information is about or on our IMS forms. (Where applicable information may be collected from the parent or guardian of a student under the age of 18.)
4. Q-RIIMS will collect personal information from staff, suppliers and sub contractors in order to obtain the information required to meet our IMS, employment, legal and taxation obligations.
5. Information collected includes general personal details, and may include details of any police checks, disability or health issue that may affect the staff member's ability to meet the requirements of their position.

1.2 Use and disclosure of personal information

Trainers

1. Q-RIIMS uses personal information of its staff, suppliers, sub contractors for the purposes of meeting employment requirements including payroll, superannuation and taxation.

Clients

2. Q-RIIMS uses personal information of its clients for the purposes of meeting requirements to comply with our IMS and for Salesforce reporting requirements where relevant, or as specified by government regulators.
3. Personal information as collected through the enquiry or enrolment form in our website or through other means will be passed on to government as per legal data collection requirements.
4. This personal information may also be accessed for the purposes of an audit by external and internal auditors.
5. Personal information will not be used in any way other than those outlined in this policy, and any other ways that might reasonably be expected except in circumstances where they may be an exception as follows:
 - Where the use or disclosure of this information is required or authorised by or under an Australian law or a court/tribunal order;
 - The individual would reasonably expect Q-RIIMS to use or disclose the information for the secondary purpose;
 - A permitted general situation exists in relation to the use or disclosure of the information by Q-RIIMS;
 - A permitted health situation exists in relation to the use or disclosure of the information by Q-RIIMS;
 - Q-RIIMS reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by or on behalf of, an enforcement body. Where Q-RIIMS uses an individual's personal information under this clause, Q-RIIMS must obtain consent in writing to release, use or disclose the personal information at all times

Other Means of Access

If Q-RIIMS refuses:

To give access to the personal information for reasons previously outlined; or to give access in the manner requested by the individual. Access may be given through the use of a mutually agreed intermediary.

Access Charges

As an organisation Q-RIIMS may charge for giving access to the personal information however the charge must not be excessive and must not apply to the making of the request. Where Q-RIIMS charges a fee to give access to personal information held about the individual, this charge will be provided up front and will only cover the cost of providing the information where this is reasonable for admin, photocopying and printing, as well as postage if required.

Refusal to Give Access

If Q-RIIMS refuses to give access to the personal information because of any of the reasons as an exception to access, or where Q-RIIMS refuses to give access in any manner requested by the individual, Q-RIIMS must give the individual a written notice in a timely manner that sets out:

The reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and

- The mechanisms available to complain about the refusal; and
- Any other matter prescribed by the regulations.

If Q-RIIMS refuses to give access to the personal information because giving access would reveal evaluative information generated within Q-RIIMS in connection with a commercially or legally sensitive decision-making process, the reasons for the refusal may include an explanation for the decision.

Note(s)

Where the individual chooses to use a pseudonym or maintain anonymity and this is not detrimental to their engagement with Q-RIIMS services or not inhibit Q-RIIMS adherence to legislative compliance, Q-RIIMS will act upon the individual's request in a timely manner where reasonable in relation to the requested and for that particular matter only.

1.3 Access to personal information

1. It is a policy of Q-RIIMS to allow access to personal files at any time to the person to whom those files relate, upon written request.
2. Trainers and clients may access their files by submitting their written application to Student Administration.

1.4 Storage and security of personal information

1. Q-RIIMS will take all reasonable steps to maintain the privacy and security of personal information.
2. Information stored electronically is kept on a secure server and access is restricted to authorised employees. This server is regularly backed up and kept in a secure location.
3. Paper-based documents containing personal information are in a locked filing cabinet and held within a secure area within Q-RIIMS premises.
4. Where documents are required to be transferred to another location, personal information is transported securely in a document holder

5. Reasonable steps will be taken to destroy or permanently dis-identify personal information when it is no longer required for any purpose.
6. Student information will be kept electronically for a period required by our auditors and IMS.

1.5 Confidential Information

1. Q-RIIMS will make all reasonable efforts to protect confidential information received from clients or alliance/support organisations during the course of business operations. This information will not be disclosed without the prior consent of the client or partner organisation.

1.6 Direct Marketing

Where Q-RIIMS holds personal information and excluding any sensitive information about an individual, Q-RIIMS will not use or disclose this information for the purpose of direct marketing unless the following circumstances apply:

1. Written consent has been collected by the individual;
2. The individual would reasonably expect Q-RIIMS to use or disclose the information for that purpose;
3. The individual has not made such a request to Q-RIIMS.
4. Q-RIIMS provides an opt-out method that is easily accessible for individuals to request not to receive direct marketing communications from Q-RIIMS;
5. Where Q-RIIMS does have written consent for the collection, holding and use of their personal details (excluding sensitive information), Q-RIIMS must provide a simple means by which the individual can easily request not to receive direct marketing communications from Q-RIIMS. Q-RIIMS provides this through an unsubscribe function on it's newsletter and social media sites or by contacting Q-RIIMS directly and requesting that direct marketing that the individual believes it has not consented to or no longer wishes to receive to cease.

1.7 Gateways system

Q-RIIMS also uses Westpac as its payment Gateway and the following is adhered to if customers wish to use this facility:

At all times, if you paying with card payments via PC/MAC transmission, Q-RIIMS complies with our gateway suppliers requirements to use a minimum Secure Socket Layer (SSL) of 128-bit encryption and if Westpac has advised, 3D Secure. For more information, contact our Gateway supplier or a Westpac sales representative.

Our web site does not:

- (a) contain anything that constitutes or encourages a violation of any applicable law or regulation, including but not limited to the sale of illegal goods or the violation of export controls, obscenity laws or gambling laws;
- (b) offer for sale goods or services, or use or display materials, that may be considered by a reasonable person to be obscene, vulgar, offensive, dangerous, or are otherwise inappropriate.

(c) the trading name and URL do not have any substantial differences in wording. This maintains consistency and reduce any potential cardholder confusion.

- a) Payment pages provided will be accredited by us or a Westpac accredited provider and must adhere to our security requirements.
- b) Each merchant domain name must utilise separate payment pages.
- c) Q-RIIMS must enable the use at all times of a Secure Socket Layer (SSL) of 128-bit or 3D Secure encryption or higher to establish a secure browser session between you and Q-RIIMS when receiving cardholder information via the internet.
- d) If 3D Secure is required by Westpac as a requirement of approval of our Merchant Facility, we ensure all MasterCard and Visa card payments for our products/services are entered by our customers through an operational 3D Secure Merchant PlugIn.
- e) If any information we provide is untrue, inaccurate, not current or incomplete, our suppliers have the right to decline or refuse any and all current or future use of the facility.
- f) Our suppliers also reserve the right, in their sole discretion, to decline, de-activate or terminate any merchant who: (a) engages in any activities that infringe the rights of any third party, including but not limited to the intellectual property, business, contractual, or fiduciary rights of others; or (b) has substantially changed its goods or services or other material aspects of the merchant's web site from the time it was approved.

1.8 Correction of Personal Information

Where Q-RIIMS holds personal information about an individual, and is either satisfied that having regard to a purpose for which the information is held, the information is inaccurate, incomplete, irrelevant or misleading or the individual requests that Q-RIIMS correct the information, Q-RIIMS must take such reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

1.9 Refusal to Correct Information

Where Q-RIIMS refuses to correct the personal information as requested by the individual, Q-RIIMS must give the individual a written notice that sets out:

- i. The reasons for the refusal except to the extent that it would be unreasonable to do so; and
- ii. The means available to complain about the refusal; and
- iii. Where Q-RIIMS is required to provide a statement, Q-RIIMS must take steps that are reasonable in the circumstances to associate a statement in such a way that will make the statement apparent to users of that information.
- iv. Any other matter prescribed by the external bodies or authorities
- v. Q-RIIMS must issue the statement in a timely manner after the request is made

For further questions or clarity regarding this new legislation, please [contact us](#)

2.0 This policy is also supported by

Do Not Call Register Act 2006;

Spam Act 2003; or

Any other legislative document of the Commonwealth government.

Policy Revised

16.11.2016