



## PRIVACY POLICY

### 1. Overview

Steam Capital Pty Ltd ABN 82 625 827 205 ("**Steam Capital**") is committed to protecting your privacy.

Steam Capital is bound by the *Privacy Act 1988 (Cth)* ("**the Privacy Act**"), including the 13 Australian Privacy Principles ("**APP(s)**"). Steam Capital will collect, manage, use and disclose, Personal Information in accordance with its Privacy Policy and all relevant Australian legislation.

### 2. The Policy

#### 2.1 Legislation

The Privacy Act outlines a comprehensive national privacy scheme for private sector organisations. Minimum standards are established for the handling of Personal Information by private organisations. The AAPs are the standard principles Steam Capital complies with in relation to the Personal Information it holds.

#### 2.2 Collection

Steam Capital only collects Personal Information that is reasonably necessary for its functions and activities. Furthermore, Personal Information and Sensitive Information is collected through our website and mobile application, as they exist from time to time.

Steam Capital may collect and hold Personal and/or Sensitive Information about you, including your:

- Name;
- Address;
- Gender;
- Address;
- Contact Details (phone number, facsimile number, email address);
- Location Information;
- Date of Birth;
- Language;
- Political opinions;
- Membership of a political association;
- Religious beliefs or affiliations;
- Philosophical beliefs;

- Sexual orientation or practices;
- Aboriginal and Torres Strait Islander status;
- Tax File Number;
- Unique Student Identifier (USI);
- Bank account details;
- Academic history;
- Employment record;
- Membership of a professional or trade association;
- Membership of a trade union;
- VET FEE-HELP status;
- Nationality;
- Visa details;
- Passport details;
- Photograph;
- Travel details;
- Criminal record;
- Preferred course of study;
- Accommodation preferences;
- Dietary requirements;
- Physical attributes;
- Medical history;
- Health cover details;
- Next of Kin details;
- Nominated person's contact details;
- Other information relevant to providing you with the services you, or someone else you know, is seeking.

The Personal Information that Steam Capital collects and holds about you, depends on your interaction with Steam Capital. Generally, Steam Capital will collect and hold your Personal and/or Sensitive Information for the purpose of:

- Assessing of your, or some else's application;
- Providing services to you or someone else you know;
- Tailoring programs and services to suit your learning methods;
- Tracking your study progress;
- Recording concerns, complaints and resolutions;
- Allocating and distributing study and career resources;
- Recording payment details;
- Providing you with information about other services, programs and activities that Steam Capital offers that may be of interest to you;
- Providing you with information about Steam Capital news and any updates such as fees or policies;
- Facilitating Steam Capital's internal business operations, including the fulfilment of any legal requirements;
- Analysing Steam Capital's services and customer needs with a view to developing new and/or improved services;
- Contacting you, in the case of an emergency involving someone else you know;
- Contacting you in relation to employment opportunities;
- Contacting you to provide a testimonial for Steam Capital;
- Contacting you in relation to post-course activities;

- Contacting your nominated person to retain communication with you in circumstances where we are unable to reach you; and
- Providing assistance and support to you by Steam Capital employees and agents in relation your application and study progressions.

Personal Information will generally be collected by Steam Capital directly from you using Steam Capital's, or its authorised agents, standard forms or by direct communication. If Personal Information is collected from you indirectly because it is unreasonable or impractical to collect it directly from you, we will endeavour to notify you in advance, or as soon as reasonably practicable after the information has been collected.

### **2.3 Use and Disclosure**

Steam Capital uses and/or discloses Personal Information and/or Sensitive Information about you for the purposes for which it was collected. In some instances, Steam Capital may also disclose Personal and/or Sensitive Information about you to:

- Service providers who assist Steam Capital in operating its business. Please note that service providers are required to comply with Steam Capital's Privacy Policy and Confidentiality policies handling your Personal and/or Sensitive Information;
- A purchaser of the assets and operation of Steam Capital's business, providing those assets and operations are purchased as a going concern;
- Its related entities;
- Related and affiliated third parties for the purpose of solicited and unsolicited marketing and advertising;
- Third parties for the purpose of solicited and unsolicited marketing and advertising;
- Overseas agencies for promotion and marketing, noting that they have agreed to be bound by and are contractually obliged to adhere to the Australian Privacy Principles;
- Commonwealth and State Governments and Agencies; and
- Offshore Entities. In accordance with APP 8, Steam Capital takes reasonable steps to ensure that offshore entities do no breach any of the APPs other than APP 1 in relation to open and transparent management of personal information.

### **2.4 Anonymity and pseudonymity**

The APPs provide for the option of having you dealt with anonymously or by pseudonym. You can request that you be treated as anonymous or use a pseudonym during your interaction with Steam Capital. However, please note that Steam Capital is not required to provide this option where:

- We are required or authorised by law or a Court or tribunal order to deal with identified individuals; or
- It is impracticable for Steam Capital to deal with individuals who have not identified themselves.

## **2.5 Security**

All reasonable measures will be taken to ensure Personal and Sensitive Information is stored safely to protect it from misuses, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

Steam Capital will ensure that Personal and Sensitive Information is kept for no longer than is necessary for the purposes for which it may lawfully be used. Records will be disposed of securely and in accordance with any requirements for the retention and disposal of Personal and Sensitive Information.

## **2.6 Access to Personal Information and Sensitive Information**

Steam Capital will provide you with access to your Personal and/or Sensitive Information about them upon receipt of a written request sent to our contact details provided below. Steam Capital will endeavour to acknowledge such requests within 14 days of its receipt and provide the requested information/documentation within 30 days. A reasonable fee may be charged to cover costs of processing such requests.

Please note that there may be certain circumstances where Steam Capital may decline a request for access to Personal and /or Sensitive Information:

- The request for access is frivolous or vexatious;
- Providing access would pose a serious threat to the life or health of an individual;
- Providing access would have an unreasonable impact upon the privacy of other individuals;
- The information relates to existing or anticipated legal proceedings between Steam Capital and you, and the information would not be accessible by the process of discovery in proceedings;
- Providing access would reveal information about a commercially sensitive decision making process;
- Providing access would be unlawful;
- Denying access is required or authorised by or under law;
- Providing access would be likely to prejudice an investigation of possible unlawful activity; or
- Providing access would be likely to prejudice the activities of enforcement bodies.

## **2.7 Correction of Personal Information**

If you believe Steam Capital holds inaccurate or outdated information about you, you should notify Steam Capital immediately by contacting us via contact details provided below. Steam Capital will take reasonable steps to correct the information so that is accurate, complete and up to date.

## **2.8 Complaints**

If you believe Steam Capital has breached the APPs, you may make a complaint in writing to Steam Capital at the contact details provided below.

Steam Capital will endeavour to acknowledge such complaints within fourteen (14) days of its receipt and will thereafter propose a deadline for a response.

Steam Capital's main objective in responding to privacy complaints is to conciliate an outcome which is acceptable to the complainant and which addresses any broader or systemic privacy issues which may arise.

If you do not agree with Steam Capital's response, an internal review process is available or a complainant may refer the matter for independent mediation by the Office of the Information Commissioner.

### 3. Further Information

The Australian Privacy Principles Guidelines are located on the following website:

[https://www.oaic.gov.au/resources/agencies-and-organisations/app-guidelines/APP\\_guidelines\\_complete\\_version\\_1\\_April\\_2015.pdf](https://www.oaic.gov.au/resources/agencies-and-organisations/app-guidelines/APP_guidelines_complete_version_1_April_2015.pdf)

### 4. Related Procedures

Information and notification will be provided in the event that the law changes and those changes affect Steam Capital's use of Personal and/or Sensitive Information.

### 5. Definitions

**Personal Information** is defined in the Privacy Act to mean information or an opinion, whether forming part of a database or not, whether true or not and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable:

- a) Whether the information or opinion is true or not; and
- b) Whether the information or opinion is recorded in a material form or not.

**Location Information** allows us to infer that you are either interested in the place or that you might be at the place. For example, if your device connects to, or appears to be within range, of a particular shopfront, we infer that you may like to see information about that shop. We use that information to provide you with information about that shop, or similar shops, to you.

**Sensitive Information** is defined in the Privacy Act to mean information or an opinion about an individual's:

- a) Racial or ethnic origin;
- b) Political opinions;
- c) Membership of a political association;
- d) Religious beliefs or affiliations;
- e) Philosophical beliefs;
- f) Membership of a professional or trade association;
- g) Membership of a trade union;
- h) Sexual orientation or practices;
- i) Criminal record – that is also personal information;
- j) Health information about an individual;
- k) Genetic information about an individual that is not otherwise health information;

- l) Biometric information that is to be used for the purpose of automated biometric verification or biometric identification;
- m) Biometric templates; and/or
- n) Psychometric information.

## 6. Contact Details

**Steam Capital Pty Ltd**

Emirates House  
Level 14  
167 Eagle Street  
Brisbane  
Queensland  
Australia 4000

Ph.: +61 7 3607 3812  
Email.: [info@steamcapital.com.au](mailto:info@steamcapital.com.au)

<b>Policy Name:</b>	<b>Steam Capital Privacy Policy</b>
<b>Contact Person:</b>	<b>Libby Marshall</b>
<b>Date Last Amended:</b>	<b>17 December 2019</b>
<b>Date Last Reviewed:</b>	<b>18 November 2019</b>
<b>Date of Next Review:</b>	<b>1 January 2020</b>