

Sunnyhills School Privacy Policy

This Privacy Policy explains how:

- Sunnyhills school protects the privacy of personal information and health information which Sunnyhills school collects and uses;
- Sunnyhills school may use such information and to whom such information may be disclosed; and
- individuals can access their personal information, correct any personal information which Sunnyhills school holds, lodge complaints in relation to alleged breaches of privacy or make any related enquiry.

Scope

All members of Sunnyhills school faculty, staff, contractors and volunteers must comply with this policy in relation to any personal information they handle.

Personal information may be collected from any individual with whom Sunnyhills school may have contact, including current and prospective students and their parents/guardians, alumni, job applicants, volunteers, contractors, past employees and other individuals who come into contact with Sunnyhills school.

Sunnyhills school may also collect, use and disclose health information in relation to the provision of health services to students while in the care of Sunnyhills school.

Types of information Sunnyhills school collects and holds

Sunnyhills school collects a range of personal information about an individual, including an individual's name, address, telephone number, email address, age and date of birth.

In addition to this information, where Sunnyhills school provides health services in the course of discharging its duty of care, Sunnyhills school may collect information about health services previously provided to an individual, an individual's current health status and an individual's expressed wishes in relation to the provision of health services.

Sunnyhills school may also collect information about individuals when individuals access Sunnyhills school's website for statistical purposes. Information Sunnyhills school collects from visits to its website is generally anonymous and Sunnyhills school does not use such information to identify individuals. However, due to the nature of internet protocols, such information may contain details which may identify a particular individual, such as the IP address of the computer accessing Sunnyhills school website, the internet service provider used by the individual, the web-page directing the individual to Sunnyhills school's website and the individual's activity on Sunnyhills school's website.

How Sunnyhills school collects personal information

Sunnyhills school may collect personal information from an individual from a variety of sources, including:

- a form that is completed and submitted to Sunnyhills school;
- a telephone, email or in-person inquiry or discussion about Sunnyhills school and the services that Sunnyhills school provides;
- mail correspondence, emails and other electronic means (including by accessing Sunnyhills school's website and use of the "contact us" form);
- publicly available sources of information;
- reference from another school about an individual student; and
- a report provided to Sunnyhills school by a medical professional in relation to health services previously provided or to be provided by Sunnyhills school to an individual.

Sunnyhills school will usually collect personal information directly from the individual, unless it is unreasonable or impracticable to do so. Additionally, Sunnyhills school will usually only collect personal information when Sunnyhills school asks for that personal information. However, Sunnyhills school may from time to time receive unsolicited personal information about an individual. Where Sunnyhills school determines that Sunnyhills school could not have collected such personal information lawfully, then Sunnyhills school will promptly destroy or de-identify such information.

Sunnyhills school may collect data from its website using various technologies, including "cookies". A "cookie" is a text file that Sunnyhills school's website sends to an individual's browser which is stored on the individual's computer as an anonymous tag identifying the individual's computer (but not the individual) to Sunnyhills school. A browser can be configured to disable cookies; however, parts of Sunnyhills school may not function properly (or at all) if cookies are disabled.

From time to time, Sunnyhills school may seek consent of parents/guardians to using their child's name, image and likeness in materials produced or published by Sunnyhills school, including newsletters, magazines, posters and other advertising materials to promote Sunnyhills school and its services. Where parents/guardians do not consent to their child's name, image and likeness being used by Sunnyhills school in this manner, Sunnyhills school will refrain from using their child's name, image and likeness. Additionally, parents/guardians may at any time withdraw their consent and Sunnyhills school will promptly remove their child's name, image and likeness from the materials produced or published.

How Sunnyhills school uses personal information it collects

Sunnyhills school generally only uses personal information for the primary purpose for which personal information is collected or a secondary purpose when permitted by the Privacy Act.

To the extent that Sunnyhills school collects “sensitive information” (as the Privacy Act defines the term), then Sunnyhills school would only use such information for the primary purpose of collection and for any secondary purposes which are directly related to the primary purpose and you would reasonably expect Sunnyhills school to use or disclose the information for the secondary purpose.

Sunnyhills school may use or disclose personal information (including sensitive information) for a purpose other than the primary purpose of collection if authorised or required by law.

Sunnyhills school collects personal information for the purposes of:

- facilitating its ability to function as an educational institution;
- other administrative functions, including assessing job applicants and managing volunteers;
- fulfilling its duty of care to its students;
- complying with its legal obligations owed to the government in relation to the provision of education to students;
- addressing queries or resolving complaints;
- marketing Sunnyhills school and the education services Sunnyhills school provides to prospective students;
- keeping parents and guardians informed on matters relating to their child’s schooling at Sunnyhills school through correspondence, newsletters, magazines and reports;
- assessing applications for scholarships to attend Sunnyhills school and awarding and administering scholarships to current students at Sunnyhills school; and
- seeking and administering donations and bequests made to Sunnyhills school.

Sunnyhills school may also disclose personal information it collects from individuals to third parties, such as Sunnyhills school’s bankers, professional advisers, courts, tribunals, regulatory authorities, other companies and individuals for the purpose of:

- complying with its obligations owed to an individual under any contract between Sunnyhills school and the individual, or as required by law;
- enabling those third parties to perform services on behalf of Sunnyhills school; and
- recovering debts where amounts owed to Sunnyhills school in consideration for services Sunnyhills school provides remain due and outstanding beyond the payment terms.

Third parties Sunnyhills school engages from time to time may have access to personal information held by Sunnyhills school about individuals, but Sunnyhills school will not authorise them to use such information for any other purpose.

Sunnyhills school may disclose personal information (including sensitive information) held about an individual to another school, government departments (where Sunnyhills school must disclose such information for the purpose of Sunnyhills school complying with its legal obligations), medical practitioners, service providers

(including specialist visiting teachers and sports coaches), recipients of Sunnyhills school publications (such as newsletters and magazines), and parents and guardians.

Sunnyhills school may use health information collected about an individual for the purpose of providing health services to that individual where required. Sunnyhills school may disclose health information to a medical professional or to a health service provider where that other health service provider is engaged in providing health services to that individual. Sunnyhills school will not use or disclose such health information for a purpose other than the primary purpose of collection unless:

- the individual consents to the use or disclosure;
- the secondary purpose is directly related to the primary purpose and the individual would reasonably expect Sunnyhills school to use or disclose the information for the secondary purpose;
- the use or disclosure is required, authorised or permitted, whether expressly or impliedly by or under law; or
- as otherwise lawfully authorised, permitted or required.

Effect of non-provision of personal information; anonymity and pseudonymity

From time to time you may be able to deal with Sunnyhills school anonymously or by using a pseudonym. For example, without limitation, if you have a general inquiry about us, and/or our services, we may be able to respond to your inquiry on an anonymous or pseudonymous basis.

However, if you do not provide the personal information Sunnyhills school requests, or you provide the information anonymously or pseudonymously, then Sunnyhills school may be unable to provide or fulfil its functions as an educational institution to you or to your child or discharge its duty of care to you or to your child.

Further, in some situations, Sunnyhills school may need to verify your identity as part of Sunnyhills school's response to a request to access and/or correct personal information or health information Sunnyhills school holds about an individual, or as part of Sunnyhills school's complaints handling procedure. If Sunnyhills school cannot verify your identity, or you continue to engage with Sunnyhills school in an anonymous or pseudonymous basis, then Sunnyhills school may be unable to complete your request or pursue its complaints-handling procedure.

Direct marketing

Sunnyhills school may directly market its services to you on the basis that you would reasonably expect Sunnyhills school to do so, where Sunnyhills school has already collected your personal information. Where Sunnyhills school collects personal information about you from a third party, Sunnyhills school will not use that information to directly market to you without your consent.

Sunnyhills school will also comply with other laws relevant to marketing.

All direct marketing communications which Sunnyhills school send will include an easy opt-out procedure if at any time you wish Sunnyhills school to stop sending you information about Sunnyhills school or its services.

Cross-border transfer or disclosure of information

Sunnyhills school may disclose an individual's personal information to entities outside our host country from time to time. For example, Sunnyhills school may be required to disclose the personal information of students transferring to another school in another country.

Sunnyhills school may transfer health information about an individual to an entity other than Sunnyhills school or the individual which is outside the host country or state only when Sunnyhills school reasonably believes that the recipient is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the requirements under the law.

In the event Sunnyhills school engages in cross-border disclosures of information, Sunnyhills school will ensure that adequate security mechanisms are in place to protect the information disclosed. Wherever reasonably practicable, Sunnyhills school will first seek your consent to such cross-border disclosure. Where you consent to such disclosure, Sunnyhills school will be exempt from the requirements of the Privacy Act of the host country in relation to such disclosed information. Where it is not reasonably practicable for Sunnyhills school to obtain your consent, Sunnyhills school will otherwise comply with the requirements of the Privacy Act of the host country.

Quality and security of information

Sunnyhills school takes reasonable steps to ensure that, having regard to the purpose for which the information is to be used or disclosed by Sunnyhills school, the personal information and the health information Sunnyhills school collects, uses, holds or discloses is accurate, complete, up-to-date and relevant to Sunnyhills school's functions or activities.

Additionally, Sunnyhills school will take reasonable steps to destroy or de-identify personal information it holds about an individual if Sunnyhills school no longer requires that personal information.

Sunnyhills school has implemented procedures and adopted technical and security measures to ensure that the security of individuals' personal information and health information is not compromised.

Personal information collected from Sunnyhills school's website and from other channels you may have used (such as email, telephone or by written correspondence) is stored by Sunnyhills school on a secure server.

All personal information is encrypted and all internet links maintained by Sunnyhills school have firewalls to ensure a high level of security.

Sunnyhills school will only retain personal information for the period necessary for the use for which it is submitted to Sunnyhills school.

Accessing and correcting information

You are entitled at any time, upon request, to access the personal information Sunnyhills school holds about you. Sunnyhills school will respond within a reasonable period of time after Sunnyhills school receives the request. Sunnyhills school will give access to the information in the manner you request, unless it is impracticable for Sunnyhills school to do so. Sunnyhills school is entitled to charge you a reasonable administrative fee for giving access to the information requested.

Sunnyhills school may from time to time refuse an individual access to the information Sunnyhills school holds about that individual, in accordance with the relevant legislation. Where Sunnyhills school refuses access, Sunnyhills school will explain the reasons for refusal in writing and, if you wish to lodge a formal complaint about our refusal, Sunnyhills school will explain the complaint procedure.

Sunnyhills school reserves the right to verify your identity before granting access to the personal information Sunnyhills school holds about you.

If at any times you believe that personal information Sunnyhills school holds is incorrect, incomplete or inaccurate, you may request that we amend such personal information. If Sunnyhills school refuses the correction request, then Sunnyhills school will provide written reasons and information about Sunnyhills school's complaints-handling process should you not be satisfied with those reasons.

Where Sunnyhills school corrects the personal information held about an individual, Sunnyhills school will take reasonable steps to notify third parties of the correction.

Lodging a complaint

If you wish to complain about an alleged breach of the privacy of your personal information, the complaint should be made in writing to the attention of Sunnyhills school's Privacy Officer of the below address.

Sunnyhills school will acknowledge receipt of your complaint and Sunnyhills school will endeavour to deal with your complaint and provide you with a response within a reasonable time following receipt of your complaint (generally 30 days of receipt of your complaint). Where a complaint requires a more detailed investigation it may take longer to resolve. If this is the case, Sunnyhills school will provide you with progress reports.

Sunnyhills school will verify your identity and seek, where appropriate, information from you in connection with the complaint.

Where required by law, Sunnyhills school will acknowledge your complaint in writing and provide information in writing on how we will deal with your complaint. Further, if required to do so by law, Sunnyhills school will provide our determination on your complaint to you in writing.

Sunnyhills school may refuse to investigate and deal with a complaint if Sunnyhills school considers it to be vexatious or frivolous.

If you are dissatisfied with the outcome of your complaint, you may seek an internal review of our decision, which will be completed by an officer not previously involved in your complaint. If you remain dissatisfied, you may escalate your complaint to the relevant office of the host country government.

Contact details

[Insert address here]