

The University of Adelaide

Privacy Policy

The University of Adelaide is an entity which directly collects information from individuals. This privacy policy will detail what data will be collected from individuals, as well as how the data will be used. The University respects the privacy of all parties, and pledges to uphold the guidelines as provided by the EU General Data Protection Regulation (GDPR).

What data is collected?

1. The Personal Information of individuals will only be collected where relevant or necessary to the University.
2. Sensitive Information of individuals will only be collected by the University:
 - i. with consent from the individual; or
 - ii. if required by Australian law; or
 - iii. if the [Privacy Act](#) grants an exemption.

How is your data collected?

3. The Personal Information of individuals will be collected via legal and justified means, directly from the individual where possible.
4. The methods in which Personal Information will be collected includes, but are not limited to:
 - i. correspondence and submitted forms (including online);
 - ii. as part of any registration process;
 - iii. in the course of undertaking research;
 - iv. direct contact via the administration of University activities and services;
 - v. from third parties the University collaborates with;
 - vi. from the individual's activity on the digital services offered by the University;
 - vii. from CCTV footage captured on campus premises.
5. The University will provide individuals with a Privacy Statement as soon as possible before or after collecting their Personal Information.
6. The University will destroy or de-identify any Personal Information obtained via unsolicited means, unless the University has legal basis on which to retain it.
7. Individuals will be given the choice to be anonymous, except where:
 - i. required by Australian law; or
 - ii. it is unfeasible for the University to deal with anonymity.
8. Individuals are encouraged to keep their Personal Information updated should any changes occur.

How will your data be used?

9. The University collects Personal Information on the following groups of people:
 - i. **Students**
The Personal Information of Students may be used for:

- a. assessing admissions;
- b. managing their course of study;
- c. monitoring progress in their course of study;
- d. fulfilling external reporting requirements;
- e. internal administration and development;
- f. management of welfare;
- g. communication;
- h. administering University Council electoral rolls.

Students' Personal Information will be managed in accordance with the [Student Privacy Statement](#). The University may use any photographs taken of students for promotional purposes.

ii. Prospective Students

The Personal Information of Prospective Students may be used for:

- a. informing prospective students about the University;
- b. assessing admissions;
- c. internal development.

iii. Employees, Job Applicants, Contractors, Volunteers or Titleholders

The Personal Information of employees, job applicants, contractors, volunteers or titleholders may be used for:

- a. assessing applications;
- b. administration and management;
- c. management of welfare;
- d. fulfilling external reporting requirements;
- e. internal administration and development;
- f. creating a public University staff contact directory;
- g. administering University Council electoral rolls.

The information of University personnel may be added to the University's database at their approval, to be used as contact information for future vacancies.

The University may use the names, expertise, and photographs taken of University personnel for promotional purposes.

iv. Alumni and Donors

The Personal Information of Alumni and Donors may be used for:

- a. promoting University events;
- b. fundraising;
- c. public acknowledgement (unless otherwise requested);
- d. administering University Council electoral rolls;
- e. internal administration and development;
- f. evaluating prospective donors by building profiles.

The names of all graduates and their awards will be published in graduation booklets.

Third parties may request the University to confirm an individual's graduate status.

v. Research Participants

The University may use the Personal Information of research participants for research purposes, or as future contact, subject to any restrictions by the human research ethics committee.

vi. Clients of health or counselling services offered by the University

The University may use clients' Personal Information to provide services as required. For recipients of Disability Services, their Personal Information will be used to administer additional support.

vii. Customers, Users or Attendees of University facilities, services, events, or activities

The Personal Information of the aforementioned parties may be used for:

- a. provision of amenities;
- b. administration and monitoring of attendance at such events;
- c. internal administration and development;
- d. ensuring security;
- e. promoting other University events.

10. With the individual's permission, the following third parties may be given access to their Personal Information:

- i. Government departments and agencies;
- ii. the University's Controlled Entities;
- iii. external service providers;
- iv. collaborating parties.

11. The third parties to whom the University may disclose Personal Information to may be located in the following locations outside of Australia:

- i. United States of America
- ii. Canada
- iii. United Kingdom
- iv. European Union
- v. Singapore
- vi. Hong Kong

12. If Personal Information is disclosed to a recipient outside of Australia by the University, the University will:

- i. bind the recipient in a contract to uphold the privacy obligations as dictated by, or substantially similar to, the GDPR; or
- ii. obtain the express permission of the individual to disclose their Personal Information to the third party.

13. The individual will be notified with a Privacy Statement if the University gathers or divulges Personal Information for other purposes than those stated above.

14. In absence of the purposes stated above, the University will only utilise or divulge Personal Information for reasonable reasons, or as permitted under the [Privacy Act](#).

15. The University will only use the Personal Information of individuals for marketing purposes if express permission is given by the individual, or it falls under Policy Principle 9(i). The University will ensure that the individual has easy access to opting out of receiving marketing offers.

16. The University will take reasonable steps to ensure that any Personal Information collected is:

- i. correct, updated, and complete;
- ii. relevant in regards to the purpose of any usage or disclosure;
- iii. protected from mismanagement or loss;
- iv. destroyed or de-identified if no longer needed.

How will your data be stored?

17. All data will be stored in either hardcopy or digitally, on computing equipment belonging to the University, or third party servers.

What are your data protection rights?

18. Each individual is entitled to their data protection rights, namely:

- i. **Access** – Individuals may request a copy of their Personal Information from the University.
- ii. **Rectification** – Individuals may request the University to amend incorrect information, or complete any incomplete information.
- iii. **Erasure** – Individuals may request the University to erase their Personal Information.
- iv. **Restrict Processing** – Individuals may request that the University restrict processing of their Personal Information.
- v. **Object to Processing** – Individuals may object to the University processing their Personal Information.
- vi. **Data Portability** – Individuals have the right to request the University to transfer their Personal Information directly to them, or to a third party.

19. Individuals may withdraw their consent to having their Personal Information be collected, processed, and stored at any time.

20. The procedure for requesting access for University personnel is contained in the [Privacy Management Plan](#).

21. Other individuals may contact the Freedom of Information Officer, The University of Adelaide, South Australia 5005 or email foi@adelaide.edu.au for access to their Personal Information.

22. The Freedom of Information Officer may request for individuals to submit a formal application under the [Freedom of Information Act 1991 \(SA\)](#).

How can you contact us?

23. If you have have any questions regarding this Privacy Policy, the Personal Information we have collected, or would like to exercise your data protection rights, you may contact us at the following:

Requestor	Submit request to:
Student	Ask Adelaide

Employee / Titleholder	HR Service Centre
Research participant	The relevant researcher
Alumni or Donors	External Relations
Others	The relevant department of the University

24. For further queries relating to the Privacy Policy, individuals may contact the Legal and Risk Branch by email: helpdesklegal@adelaide.edu.au.

How can you report a breach or complaint?

25. Any University personnel who suspects or is aware of any mismanagement or loss of Personal Information (“data breach”) must comply with the protocols outlined in the [Data Breach Response Plan](#), which is found in the [Privacy Management Plan](#).
26. If an individual suspects their Personal Information being mishandled by the University, they may make a complaint to:
- Manager, Compliance
 - Legal and Risk
 - The University of Adelaide
 - SA 5005
 - Email: helpdesklegal@adelaide.edu.au
27. University personnel dissatisfied with the outcome of their complaint may pursue further action under the *Complaints by Staff Policy & Procedure* or the *Student Grievance Resolution Process*.
28. Any compulsory data breach protocol will be observed by the University.