



GSI Privacy Policy

Note: This policy is subject to change from time to time. Please check all GSI Policies on a regular basis for updates.

Reviewed April 2023

Global Student Institute (**GSI**) is committed to protecting the privacy of its employees, homestay students and homestay hosts and their family.

GSI is bound by the *Australian Privacy Principles (APPs)* and the *Privacy Act 1988 (Cth) (the Act)*.

Scope

This policy applies to homestay students, homestay hosts and their family, employees and volunteers. This policy outlines how the GSI collects, uses and discloses personal information.

Definitions

Employee means all employees employed by GSI, including applicants and prospective applicants.

Employee Record means a record as defined in the Act.

Homestay host is the prospective, current or past carer of a homestay student.

Homestay student means prospective, current or past homestay student of GSI.

School means the educational institution where a Homestay student attends.

Personal information is information or an opinion, whether true or not, and whether recorded in material form or not, about an identified individual or an individual whose identity is reasonably apparent, or can be determined, from the relevant information or opinion.

Sensitive information is a type of personal information. It includes information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preference or practice, or criminal record. Sensitive information also includes biometric information that is used for the purpose of automated biometric verification, biometric identification or biometric templates.

Health information is a subset of sensitive information. It is information or an opinion about the health or disability of an individual and information collected to provide, or in providing a health service.

Health service includes an activity performed to assess, record, maintain or improve an individual's health, to diagnose an illness or disability, to treat an individual, or the dispensing on prescription of a drug or medicinal preparation by a pharmacist.

Purpose

GSI collects, holds, uses and discloses personal information so that it can exercise its function and activities and fulfil relevant duties and obligations, which may include (but are not limited to):

- a) assessing eligibility and monitoring compliance with contractual obligations;
- b) providing those involved in homestay with GSI's services;
- c) supporting a Homestay student's educational, social and medical wellbeing;
- d) GSI administrative purposes, including facilitating matters in relation to payments and complaints;
- e) informing (including by direct marketing) about GSI's services and the goods and/or services of third parties available in connection with our services;
- f) creating and updating GSI's database(s);
- g) ensuring compliance with our contractual and other legal obligations;
- h) monitoring use of the Website for customer service purposes; and
- i) any other act we are required or authorised to do by law,

GSI collects and holds personal information, sensitive information and health information about Homestay students, Homestay hosts and their families and Employees.

GSI generally deals with personal and sensitive information regarding:

- a) Homestay students and Homestay hosts relating to the enrolment in the GSI Homestay program;
- b) job applicants, staff members, volunteers and contractors; and
- c) persons who are involved with GSI.

GSI collects personal information about individuals to satisfy legal obligations and to fulfil its purpose as a homestay provider. If GSI requests information to be provided and the request is not complied with, GSI may be unable to enrol a prospective Homestay student or Homestay host or continue enrolment of a current Homestay student or Homestay host in GSI's homestay program.

Collection

Personal Information

GSI collects personal information about an individual by way of forms, face to face meetings, interviews and telephone calls. Other individuals may provide personal information about a person in dealings with GSI.

GSI may collect personal information about an individual from a third party, for example, an Agent providing a report. Collection of personal information from a third party will be undertaken where it is reasonably necessary to do so. Any personal information that is unsolicited will be dealt with in accordance with the APPs.

Sensitive Information

Sensitive information will be collected by GSI where it is reasonably necessary for one or more of GSI's functions or activities. It will only be collected with consent, unless one of the exceptions under the APPs applies.

Employee Records

Under the Act, the APPs do not apply to Employee records. This means that the Act does not apply to how GSI deals with an Employee record that concerns current and former Employees of GSI.

Use and Disclosure

GSI will only use and disclose personal information for the primary purpose of collection or as otherwise specified in this Privacy Policy.

GSI may disclose personal information to a School for administrative and management purposes including insurance, child protection and professional standards.

Personal information will only be used for a secondary purpose if consent has been obtained, where it is reasonably expected or if such use or disclosure falls within a permitted exception.

Sensitive information will be used and disclosed for the primary purpose of collection, unless GSI is advised otherwise, or the use or disclosure is required / permitted by law.

Quality of Information and Security

GSI endeavours to ensure that the personal information it holds is accurate, complete and up to date. GSI will take all reasonable steps to:

- a) protect personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure; and
- b) destroy or de-identify information that is no longer needed.

Access to Personal Information

Access to records of personal information that GSI holds or concerns about the accuracy of information held by GSI should be directed to the Director of GSI.

Under the Act, an individual has the right to obtain access to personal information which GSI holds about them; there are exceptions to this, for example, where access may impact the privacy of others or pose as a threat to the individual.

To make a request to access personal information GSI requires a request in writing. GSI will respond to this request within a reasonable period of time (14 days). Where it is reasonable, GSI will provide access in the manner requested.

If a request for access is refused GSI will provide written reasons on why the request was refused

Overseas Disclosure and Cloud

GSI may disclose personal information about an individual overseas; this is likely to occur if GSI uses “cloud” service providers. When disclosing personal information GSI will take all steps reasonable to ensure that the overseas recipient complies with the APPs.

Marketing

GSI engages in marketing as a means to promote future growth and sustain and improve the homestay program for Homestay students. Personal information collected may be used to make a marketing appeal.

GSI will abide by any direction from an individual not to disclose personal information to third parties for marketing purposes.

Complaints

If an individual believes that GSI has breached the APPs a complaint can be made to GSI. All complaints should be in writing and directed to the Director. GSI will investigate complaints in a timely manner and respond in writing.

If an individual is not satisfied with GSI’s response, a complaint can be lodged with the Office of the Australian Information Commissioner on the following website <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.