



# Q.I.T.E. Privacy Policy

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**PART ONE:           CONSIDERATION OF PERSONAL INFORMATION PRIVACY**  
**APP1 – Open & transparent management of personal information**  
**APP2 – Anonymity & pseudonymity**

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## **APP1 – Open & transparent management of personal information**

### **1.1. Q.I.T.E.**

This privacy policy sets out how Mareeba Shire Job Training Association Incorporated trading as Quality Innovation, Training and Employment (Q.I.T.E.) handles your personal information.

You can access the complete Privacy Policy from:

- Reception areas of all Q.I.T.E. Sites and / or Business Enterprises;
- Q.I.T.E. [Internet](#);
- Upon request from any Q.I.T.E. staff member;
- Q.I.T.E. Intranet for internal purposes only.

Q.I.T.E. manages personal information, under the [Australian Privacy Principles \(APPs\)](#). As an APP entity and contracted service provider to the Federal Government, we comply with our obligations under the Privacy Act 1988 and Australian Privacy Principles.

The APPs regulate how we may collect, use, disclose and store your personal information, and how you may access and correct the personal information that we hold about you.

**Personal information** is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Examples of personal information are:

- a person's name, address, phone number or email address;
- a photograph of a person;
- a video recording of a person;
- a person's salary, bank account or financial details;
- details about a person's education or education activities;
- a person's medical details or health information.

Personal information includes some information that people may not normally consider to be private. For example:

- a work email address or phone number;
- opinions given as part of a person's employment;
- the fact that a person is the author of a report;
- a person's name appearing in work documents;
- a letter written in a person's official capacity, such as a letter from the president of a club.

We only collect information that is reasonably necessary for the proper performance of our activities or functions. These include but are not limited to being an employment services provider, child care service provider and passenger transport service provider. We may decline to collect unsolicited personal information from or about you and take steps to remove it from our systems.

If you have any questions please contact Q.I.T.E.'s Privacy Officer on (07) 4092 9700 or via email at [privacyofficer@gite.com](mailto:privacyofficer@gite.com)

Further information about the application of the Privacy Act (APPs) can be located on the Office of the Australian Information Commission website <http://www.oaic.gov.au/>

[Factsheet 17](#) provides an overview of the Australian Privacy Principles.

Q.I.T.E. is a contracted service provider to a range of Commonwealth and State government agencies, and it may be necessary for us to collect and manage personal information as an Agency under different privacy arrangements.

If you wish to know how this applies to you, please contact:

Q.I.T.E. Privacy Officer

Phone: (07) 4092 9700

Email: [privacyofficer@gite.com](mailto:privacyofficer@gite.com)

## **APP2 – Anonymity & pseudonymity**

### **2.1 Requests for anonymity & pseudonymity**

Q.I.T.E. will assess an individual's requests for anonymity or use of a pseudonym in accordance with the APP, and any contractual obligations as a Commonwealth Service Provider. Requests are subject to certain limitations including where it is impracticable for Q.I.T.E. to deal with individuals who have not identified themselves.

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## **PART TWO: COLLECTION OF PERSONAL INFORMATION**

### **APP3 – Collection of solicited personal information**

### **APP4 – Dealing with unsolicited personal information**

### **APP5 – Notification of the collection of personal information**

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## **APP3 – Collection of solicited personal information**

Personal information will be collected from you directly when you fill out and submit one of our registration forms, application forms or any other information in connection with Q.I.T.E. activities or functions.

### **3.1 When we collect your personal information:**

- we check that it is reasonably necessary for any functions or activities that Q.I.T.E. may conduct;
- we check that it is current, complete and accurate. This will sometimes mean that we have to cross-check the information that we collect from you with third parties;
- we record and hold your information in our information record system;
- we retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is current, complete, accurate and relevant. This will sometimes mean that we have to cross-check the information that we collect from you with third parties once again – especially if some time has passed since we last checked;
- subject to some exceptions, we permit you to access your personal information in accordance with APP;
- we correct or attach associated statements to your personal information in accordance with APP;
- we destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed provided that it is lawful for us to do so;
- we will only collect your sensitive information with your consent and if the collection is reasonably necessary for Q.I.T.E.'s functions.

In performing our functions we may collect your personal information using a variety of methods including:

- Paper based & electronic forms and correspondence;
- Attend a face-to-face meeting or event conducted by us or our contractors;
- Use our websites;
- Interact with us on our social media platforms.

For further information on what information we collect on-line see section 3.1 of this Privacy Policy.

As noted at section 2.2, in certain circumstances we may collect and receive personal information about you from third parties including Australian Government agencies and state and territory governments.

#### **APP4 – Dealing with unsolicited personal information**

##### **4.1 How we deal with unsolicited personal information**

In the instance that Q.I.T.E. receives an individual's personal information that we would not have received during our normal course of business with you, we will de-identify or destroy that information.

We sometimes collect information from third parties and publicly available sources when it is necessary for a specific purpose such as checking information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way.

#### **APP5 – Notification of the collection of personal information**

##### **5.1 Collection of sensitive information:**

In carrying out our functions and activities we may collect personal information that is *sensitive information*. The APPs impose additional obligations on us when collecting, using or disclosing sensitive information. We may only collect sensitive information from you:

- where you provide your consent; or
- where required or authorised by law; or
- where a permitted general situation exists such as to prevent a serious threat to safety.

We also collect sensitive information where authorised to do so for the purposes of human resource management, fraud investigations, taking appropriate action against suspected unlawful activity or serious misconduct, and responding to inquiries by courts, tribunals and other external review bodies.

##### **5.2 How we will notify you if we collect your personal information**

If Q.I.T.E. collects your personal information, we will always make sure that you are aware of it. This includes times when we collect your personal information from another source or it is required under Australian Law. We will always tell you why we will be or have collected your personal information and will make sure that you understand if there are any consequences of us not collecting your information. We will also tell you if we will be disclosing your personal information to any overseas recipients, including where they are and the purpose of us providing them with your personal information.

##### **5.3 Information collected by our contractors**

Under the Privacy Act, we are required to take contractual measures to ensure that contracted service providers (including sub-contractors) comply with the same privacy requirements applicable to us.

## **5.4 Our website**

### **5.4.1 Log information (browsing)**

When you use our on-line services, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your server address, your top level domain name (for example, .com, .gov, .au, .uk, etc.), the date and time of visit to the site, the pages accessed and documents reviewed, the previous sites visited, the browser type, the browser language, and one or more cookies that may uniquely identify your browser.

No attempt is made to identify you through your browsing other than in exceptional circumstances, such as an investigation into the improper use of the website.

### **5.4.2 Cookies**

A cookie is a small file that uniquely identifies your browser. It contains information that your web browser sends back to our website server whenever you visit it again.

We use cookies to 'remember' your browser between page visits. In this situation, the cookie identifies your browser, not you personally. No personal information is stored within our cookies.

### **5.4.3 Google Analytics**

We use Google Analytics to collect information about visitors to our website. Google Analytics uses cookies and JavaScript code to help analyse how users use the site. It anonymously tracks how visitors interact with this website, including how they have accessed the site (for example from a search engine, a link, an advertisement) and what they did on the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of compiling reports on website activity and providing other services relating to website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on your browser.

### **5.4.4 Links to External Websites**

Our website includes links to other websites. We are not responsible for the content and privacy practices of other websites. We recommend that you examine each website's privacy policy separately.

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## **PART THREE: DEALING WITH PERSONAL INFORMATION**

### **APP6 – Use or disclosure of personal information**

### **APP7 – Direct Marketing**

### **APP8 – Cross-border disclosure of personal information**

### **APP9 – Adoption, use or disclosure of government related identifiers**

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## **APP6 – Use or disclosure of personal information**

We only use or disclose your personal information for the purposes for which it is given to us, and these purposes will always relate to Q.I.T.E.'s functions and activities.

### **6.1 How we will use or disclose your personal information**

Q.I.T.E. may also use information that has been provided together with results of reference checks and any other information provided to Q.I.T.E. at point of registration or enrolment, for administrative, planning and reporting purposes in connection with the provision of employment and training services.

Q.I.T.E. will also provide your personal information to any other employment or training service provider that you request. Q.I.T.E. may disclose personal information that is obtained in the course of Q.I.T.E.'s functions and activities to the State and Commonwealth Public Sector organisations and agencies.

Q.I.T.E. will not otherwise, without your consent, use or disclose personal information for any purpose unless it would reasonably be expected that such purpose is related to Q.I.T.E.'s business functions and activities.

We may disclose your personal information where we are under a legal duty to do so.

We collect personal information for a variety of different purposes relating to our functions and activities including:

- Performing our employment and personnel functions in relation to our staff and contractors;
- Performing our legislative and administrative functions;
- Policy development, research and evaluation;
- Complaints handling;
- Program management;
- Contract management; and
- Management of correspondence with the public.

We use and disclose personal information for the primary purpose for which it is collected. You will be given information about the primary purpose of collection at the time the information is collected.

We will only use your personal information for secondary purposes where we are able to do so in accordance with the Privacy Act. This may include where you have consented to this secondary purpose, or where the secondary purpose is related (or if sensitive information, directly related) to the primary purpose and you would reasonably expect us to use or disclose the information for the secondary purpose, where it is required or authorised by law or where a permitted general situation exists such as to prevent a serious threat to safety.

Likely secondary purposes for which we may use or disclose your personal information include but are not limited to: quality assurance, auditing, reporting, research, evaluation and analysis, and promotional purposes.

## **APP7 – Direct Marketing**

### **7.1 Direct Marketing**

Q.I.T.E. will seek your consent prior to using your personal information for the purposes of direct marketing, and you will always be given the option to opt out, unless the direct marketing is required for Q.I.T.E. to meet an outcome for a contractual requirement as part of our functions and activities. If you 'opt out' Q.I.T.E. will amend any direct marketing list which is maintained.

There are times when Q.I.T.E. may use or disclose your personal information for the purposes of direct marketing as a contracted service provider for a Commonwealth contract. In this case, Q.I.T.E. will ensure that the collection, use or disclosure of your personal information is required to meet our obligations.

## **APP8 – Cross-border disclosure of personal information**

### **8.1 When we will disclose your personal information to an overseas recipient**

We are unlikely to disclose your personal information to overseas recipients, and Q.I.T.E. will only disclose your personal information when you have consented. We cannot guarantee that any overseas recipient of your personal information will protect it to the standard to which it ought to be protected. We will always tell you about the risks of overseas disclosure when we seek your consent.

## 8.2 Accidental or unauthorised disclosure of personal information

Q.I.T.E. will abide by the Privacy Act 1988 **Notifiable Data Breaches (NDB) Scheme** and in the event of an 'eligible data breach' (or suspected breach) involving personal information, including third party organisations and agencies with whom Q.I.T.E. shares personal information.

**An eligible data breach occurs** when serious harm has occurred, or is likely to occur, to one or more individuals affected by the loss, or unauthorised access to, or disclosure of, their personal information in circumstances where the harm cannot be prevented or mitigated through remedial action to rectify or contain the breach. If Q.I.T.E. incurs a privacy breach, we will:

- 1) undertake a reasonable and prompt assessment and investigation;
- 2) notify affected individuals and the Office of the Australian Information Commissioner where an eligible data breach is found to have occurred;
- 3) notify the department of the breach and provide copies of the notifications issued by Q.I.T.E.

Q.I.T.E. will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information. We follow the OAIC's [Data breach notification – A guide to handling personal information security breaches](#) when handling accidental or unauthorised disclosures of personal information.

Legislative or administrative sanctions may apply to unauthorised disclosures of personal information.

## **APP9 – Adoption, use or disclosure of government related identifiers**

### 9.1 Government related identifiers

Q.I.T.E. uses government identifiers for contractual purpose, as prescribed by the Government. These are used exclusively for certain notifications and correspondence under the relevant contract.

Q.I.T.E. never disclose government identifiers to a third party who does not hold the relevant contract.

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## **PART FOUR: INTEGRITY OF PERSONAL INFORMATION**

### **APP10 – Quality of personal information**

### **APP11 – Security of personal information**

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## **APP10 – Quality of personal information**

### 10.1 We will do our best to keep your information up to date

As part of our functions and activities we will ask you if your personal information that we hold is up to date and complete. If your personal information requires updating, we ask that you contact Q.I.T.E. to provide this information.

## **APP11 – Security of personal information**

### 11.1 How we keep your information secure

Q.I.T.E. takes reasonable steps to protect the personal information it holds from interference, misuse and loss, and unauthorised access, modification and disclosure. Q.I.T.E. has policies in place to ensure that your information is secure from the time of collection through to archiving and destruction. There are two exceptions which may apply:

- The personal information is contained in a Commonwealth record;
- Q.I.T.E. is required by / under an Australian law or a court order to retain the information.

Q.I.T.E. takes reasonable steps to ensure the security of your personal information, whether it is retained in hard copy or electronic files.

## 11.2 Storage

We hold personal information in a range of paper-based and electronic records, including cloud computing.

Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the Australian Government's records management regime, including the [Archives Act 1983](#), Records Authorities and General Disposal Authorities. This ensures your personal information is held securely.

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## **PART FIVE: ACCESS TO & CORRECTION OF PERSONAL INFORMATION**

### **APP12 – Access to personal information**

### **APP13 – Correction of personal information**

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## **APP12 – Access to personal information**

### **12.1 How to access your personal information**

If you wish to obtain access to your personal information you should contact our Privacy Officer. You will be asked to verify your identity before access is granted. Q.I.T.E. will:

- Endeavour to provide your personal information without any cost to you;
- Respond to your request within five (5) working days.

## **APP13 – Correction of personal information**

### **13.1 How to correct your personal information**

If you find that personal information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us directly on (07) 4092 9700 or email [privacyofficer@qite.com](mailto:privacyofficer@qite.com)

We will take reasonable steps to correct that information to ensure that the information is accurate, up to date, complete, relevant and not misleading.

If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to notify the third parties to whom we made the disclosure. Q.I.T.E. will take such steps (if any) to pass on that notification unless it is impracticable, unreasonable or unlawful to do so.

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## **Complaints**

You have a right to complain about the way Q.I.T.E. handles your personal information if you believe that we have interfered with your privacy.

For more information see our Complaints Procedure.

### **Complaints procedure**

If you are making a complaint about our handling of your personal information, it should first be made to us in writing.

You can make complaints to Q.I.T.E.'s Privacy Officer:

The General Manager, Q.I.T.E.  
39 Byrnes Street, Mareeba QLD 4880  
Phone: (07) 4092 9700  
Email: [privacyofficer@qite.com](mailto:privacyofficer@qite.com)

When we receive your complaint:

- We will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint;
- Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy;
- We may ask for clarification of certain aspects of the complaint and for further detail;
- We will consider the complaint and may make inquiries of people who can assist us to establish what has happened and why;
- We will require a reasonable time (usually 30 days) to respond;
- If the complaint can be resolved by these processes we will suggest these to you as possible solutions;
- If we believe that your complaint may be capable of some other solution we will suggest that solution to you, on a confidential and without prejudice basis in our response.

If the complaint cannot be resolved by means that we propose in our response, we will suggest that you take your complaint to any recognised external dispute resolution scheme to which we belong or to the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au))

A handwritten signature in black ink, appearing to read 'Jillian Trout', written in a cursive style.

Jillian TROUT  
General Manager