

# Privacy Policy:

- Aspire Learning Resources
- Aspire Foundation

Aspire Learning Resources  
Version 3  
14 Dec 2020

## Privacy Policy

### Aspire Learning Resources and Aspire Foundation

Aspire Training & Consulting Ltd ACN 054 306 428 trading as Aspire Learning Resources ABN 51 054 306 428 and Aspire Foundation (which, for the purpose of this Privacy Policy includes any of its Related Bodies Corporate, as that term is defined in the *Corporations Act 2001 (Cth)* (**Aspire, we, us, our**) is bound by the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Australian Privacy Principles (**APPs**) which set the standard for how we deal with your personal information.

We respect your privacy and we have developed this Privacy Policy to inform you of how we manage the personal information that we collect about you.

By providing personal information to us, you are taken to have read, and consent to the collection, use disclosure and handling of your personal information in accordance with this Privacy Policy.

#### 1 What personal information we collect about you and how we collect it

**Personal information** has the meaning given to that term in the *Privacy Act 1988 (Cth)* (**Privacy Act**) and includes information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable.

##### ***How we collect personal information***

In general, Aspire collects personal information about its customers, business partners, contractors, suppliers, prospective employees, and the employees of its contractors, corporate customers and suppliers.

In the course of providing you with products and services, Aspire collects personal information in a variety of ways. Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly, including by using cookies on our website.

We may collect personal information about you from a third party, including third parties that sell our products or introduce us to you in connection with your purchase of products. At the time of collection, or as soon as practicable after we have collected it, we will take such steps as are reasonable in the circumstances to notify you of the collection and of any matters relevant to the collection, unless it is obvious from the circumstances that you would know or would expect us to have the information.

Aspire may collect personal information about you when you:

- engage with our business and its employees in the course of receiving products, services or information from us, including when you purchase learning resources from us (online, over the phone or otherwise);
- or your employer is a recipient of an Aspire Foundation grant;
- visit our website, [www.aspirelr.com.au](http://www.aspirelr.com.au) (**Website**);
- make an enquiry about our products and/or services;
- provide us with feedback;
- participate in a survey or provide us with information that we will use in a marketing campaign;
- ask to be placed on one of our mailing lists, including our eNews eDMs either through our Website or our third party platform (such as MailChimp or Real Simple Solutions);
- supply goods or services to us; and
- apply as a candidate for a position of employment with us

or otherwise interact with us in your capacity as a customer, supplier, contractor or other person engaging with Aspire.

### ***What personal information we collect about you***

We aim to collect personal information only if it is reasonably necessary to providing the service, product or information you have requested from us. In general, you can assume that we may collect the following personal information about you:

- name;
- address;
- organisation name;
- email address;
- telephone number and other contact details;
- details about you to assist in managing our relationship with you;
- details of the products or services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries; and
- credit card details.

If you are a prospective employee, we may collect details about your employment history and other details about you to assist with the recruitment process. We may collect this information from you directly, or from a recruiter.

If you are an employee or officer of a corporate customer, supplier or contractor, we may collect personal information about the business that you represent.

If you do not provide the necessary personal information, we may not be able to provide you with the goods, services or information that you have requested from us, and the effectiveness of our programs may be affected.

## **2 Information that we collect on our Website, including how we use cookies**

Aspire's Website Supplier, Wave digital Pty Ltd, makes a record of visits made to this website and records information about how the website is being used. This information helps Aspire understand what visitors are looking for and lets us know which areas need improving.

The Website records personal information to facilitate the registration of and purchases by and deliveries to our customers. We may also use information collected through our Website for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at our Website.

This personal information is not disclosed to any third parties except Aspire's nominated service providers, for example, fulfilment partners. The website application and databases are located in Amazon Web Services' cloud infrastructure Sydney data centre.

Monitoring 'traffic' to websites is standard practice. If you create an account with Aspire, the personal information that you provide in creating an account will be stored by Amazon Web Services. Visitors to our Website who do not have an account with Aspire remain anonymous and information is collected by Google Analytics, with cookies used to record your activity and behaviours on our Website.

### 3 Purpose of collection

We collect personal information primarily to:

- provide you with the goods, services and information that you request from us;
- provide you with information about Aspire's products and services;
- suggest Aspire products and services to you; and
- manage our relationship with you.

If it is reasonable to expect that we would use or disclose your personal information for purposes which are related to the above primary purposes, we may also use or disclose your personal information to:

- facilitate a marketing program, in which you have agreed to participate;
- assist you with enquiries or complaints;
- develop and improve our client service and relationships;
- promote, advertise and market any of our products and services, including to invite you to seminars or events hosted by Aspire;
- to comply with our legal obligations (including to comply with any law or any lawful request of a law enforcement agency or government authority), resolve any disputes that we may have with any of our clients; and
- inform you of developments at Aspire and other services that we can provide.

We may otherwise use your personal information to comply with any law, and to comply with any lawful request of a law enforcement agency or government authority.

Where possible, we will provide you with a choice to opt-out of any of our marketing activities. We will respect your request to decide whether to receive these marketing communications.

### 4 Sharing of your personal information

We may disclose your personal information to:

- external providers of services that we may use to operate our business and manage our business systems (for example, this may include file storage service providers such as SharePoint, database and mail/email service providers such as MailChimp and Real Simple Solutions, marketing service providers; website suppliers such as Wave Digital Pty Ltd and Amazon Web Services; couriers and/or freight service providers, printers, call centres, providers of payment processing and identity verification services and IT technicians who may need access when providing on-site support (although it is our practice for them to work under supervision));
- our professional advisors and agents;
- our existing or potential agents, business partners or partners; and
- if you are an employee of one of Aspire's corporate customers, contractors or suppliers, Aspire may also disclose your personal information to your employer.

We may disclose your personal information to these third parties so that they can assist us with providing the best possible service to you.

Those companies will be permitted to access only the personal information they need to deliver the service to Aspire or to you. Aspire takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

We are not likely to disclose information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law.

The privacy and collection practices of entities to which we disclose personal information are governed by their own privacy policies and collection notices.

We will not otherwise disclose information about you unless the disclosure:

- is required or authorised by law; or
- you have consented to our disclosing the information about you.

## **5 Quality of your personal information**

We aim to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete.

If you believe that the information we hold is inaccurate or incomplete, please contact us and we will use all reasonable efforts to correct the information.

## **6 Securing your personal information**

We take reasonable precautions to protect your personal information from misuse, interference and loss, as well as from unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to protect your personal information. We take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

## **7 Changes to this Privacy Policy**

Aspire reserves the right to make amendments to this Privacy Policy at any time for any reason. We will publish any updated Privacy Policy on our website.

## **8 Accessing and correcting your personal information**

You have a right to request access to, or the correction of, your personal information that we hold about you, subject to exceptions allowed by law. You may be required to put your request in writing for security reasons.

We will give you access to, or correct, your personal information unless there is a lawful reason for refusing your request for access or correction. If we refuse your request we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

## **9 Change in control of Aspire**

If we sell or otherwise transfer part or the whole of Aspire or our business to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by Aspire may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the business.

## 10 Complaints

If you have a complaint about our collection, use or disclosure of your personal information, or you wish to make a complaint about a breach of the APPs, please contact our Privacy Officer at the details set out below.

In your complaint, please set out the details of your complaint and your contact details. Our Marketing Coordinator will contact you to acknowledge your request and ask for any other applicable information. Our Marketing Coordinator will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at [www.oaic.gov.au](http://www.oaic.gov.au).

## 11 Contacting us

If you have any questions about this Privacy Policy or our privacy practices, would like to make a complaint or request access to or correction of your personal information, please contact us by any of the following means.

Our contact details in respect of any issues in relation to privacy are:

<b>Telephone</b>	(03) 9820 1300
<b>Email</b>	marketing@aspirelr.com.au
<b>Post</b>	Attn: Marketing Coordinator Level 1 / 464 St Kilda Road Melbourne VIC 3004