

# Marketing Privacy and Data Collection

**Policy**

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## 1. PURPOSE

The purpose of the Marketing Privacy and Data Collection Policy is to outline JMC's transparency in the collection of information digitally via advertising and promotions, events, newsletter subscriptions, enquiries, applications, and enrolments and its usage for marketing purposes.

## 2. SCOPE

The Marketing Privacy and Data Collection Policy is applicable to all JMC's potential students, students, alumni, and staff.

## 3. DEFINITIONS

All definitions are located in the *JMC Glossary*.

## 4. POLICY

- 4.1. JMC does not collect or solicit any personal information via the JMC website and other online sources which might be unlawful, unnecessary, excessive, or unrelated to the functions or activities of the institution.
- 4.2. In collecting personal information JMC is committed to the protection of privacy, compliant with the Privacy Act 1988 and Privacy Amendment (Private Sector) Act 2000.
- 4.3. JMC may collect the following personal information from prospective students, students and alumni, when enquired about its educational services:
  - Full name,
  - Address,
  - Email address,
  - Phone number,
  - Date of birth,
  - Citizenship,
  - Current school/institution,
  - Employer,
  - Course preferences,
  - Areas of interest,
  - Event attendance,
  - Application status may also be recorded.
- 4.4. The above information is obtained via the following online forms embedded on the JMC website:
  - Ask a question,
  - Request a brochure,
  - Enquire now,
  - Apply now,
  - Live chat,
  - Newsletter subscription.
- 4.5. JMC automatically collects information about the usage of its website and/or emails through cookies and/or beacons such as Internet Protocol (IP) addresses, which may qualify as collection of personal information.
- 4.6. JMC automatically collects personal information when:

- 4.6.1. An individual voluntarily submits information, such as filling out a survey about their experience at an open day, workshop, or completion of a course.
- 4.6.2. An individual books a campus tour or a workshop or registers for an 'Open Day' and will be required to register and provide their name, an email address and phone number in order to proceed.
- 4.7. JMC, in compliance with legal obligations under applicable laws and in cooperation with public and government authorities, uses and processes personal data for a variety of purposes, including but not limited to:
  - 4.7.1. Processing of one's name and contact information to provide an individual with information about services, manage registration for and attendance at events and campus/office visits, manage registration for promotions, provide individuals with customer support or otherwise communicate with individuals.
  - 4.7.2. Processing device and usage of data to develop, improve, manage, and customise JMC websites and services, to assess and improve the related user experience, to identify customer opportunities and to guarantee the JMC website continues proper functioning.
  - 4.7.3. Sending cookies to an individual's computer when using the JMC website. A cookie is a small text file that a website saves on one's computer or mobile device when they visit the site, respond to surveys, or complete forms. It enables the website to remember the actions and preferences (such as login, language, font size, and other display preferences) over a period of time.
  - 4.7.4. Displaying personalised advertisements to the person and sending marketing communications about JMC educational products and services.
  - 4.7.5. Sending surveys to complete in order to manage the customer/student experience.
- 4.8. Information collection disclosure
  - 4.8.1. JMC discloses to the individuals that it is collecting their personal information at the point where the information is collected.
- 4.9. Using and disclosing of personal information
  - 4.9.1. JMC may share data with:
    - 4.9.1.1. Third party social media networks, such as Facebook, Google Analytics and Instagram, advertising networks and websites, which act as separate controllers, so that JMC can market and advertise on third party platforms and websites.
    - 4.9.1.2. Third party organisations that are involved in managing or administering the JMC website, including but not limited to Webcodia, Quantmlinx, Marketo and Drift.
  - 4.9.2. JMC provides links to external websites that allow for the interaction and sharing of content including social media buttons such as Facebook share, Twitter, and Google.
  - 4.9.3. Prior to disclosing any personal information to another person, institution, or organisation, JMC will take all reasonable steps to satisfy ourselves that:
    - 4.9.3.1. The person or organisation has a commitment to protecting personal information by having in place the necessary privacy policy to protect one's interests, or
    - 4.9.3.2. Where the prospective student consented to making the disclosure, or
    - 4.9.3.3. Where a prospective student is under the age of 18 years of age, JMC may provide information to the parent/guardian as listed on the enrolment form.
- 4.10. Access to the personal information

- 4.10.1. Individuals have the right to access or obtain a copy of the personal information that JMC holds about them.
- 4.10.2. If an individual considers their personal information to be incorrect, incomplete, or out of date, or misleading, they can request that the information be amended by writing to JMC's Privacy Officer at [privacyofficer@JMC.edu.au](mailto:privacyofficer@JMC.edu.au).
  - 4.10.2.1. Where a record is found to be inaccurate, a correction will be made.
  - 4.10.2.2. While JMC will not alter information that is found to be correct it will record the request to change with that information.
- 4.11. Storage and security of personal information
  - 4.11.1. JMC holds personal information in electronic form. JMC have reasonable commercial standards of technology and operational security procedures in place to protect all information provided from misuse, disclosure, and unauthorised access.
  - 4.11.2. JMC will make all reasonable endeavours to ensure that whenever personal information is disclosed to a third party, the third party is obliged to have appropriate data storage and trusted security arrangements. These third-party websites and information system platforms have their own storage, security, and privacy policies, which can be accessed via their websites.
  - 4.11.3. JMC maintains a record of third-party systems located within Australia and abroad inclusive of their privacy policies and security policies.
- 4.12. Updating your personal information and complaints
  - 4.12.1. If a prospective student, current student, or alumni (or other individual) requests to exercise rights relating to their personal data, or if they have questions regarding JMC's privacy practices, individuals can contact the Privacy Officer at [privacyofficer@JMC.edu.au](mailto:privacyofficer@JMC.edu.au).
  - 4.12.2. Individuals may request to opt-out and to stop receiving any further marketing communications about courses or events at any time by completing the 'unsubscribe' symbol accompanying each relevant email communication received from JMC, or by contacting JMC directly via the email [privacyofficer@JMC.edu.au](mailto:privacyofficer@JMC.edu.au).
  - 4.12.3. Requesting not to receive marketing communications and opting out will not unsubscribe individuals from receiving other JMC specific communication for which they provided their personal information for other purposes separately. JMC will still contact prospective or current students in respect to:
    - 4.12.3.1. Operational matters for example, information relevant to enrolment or course of study,
    - 4.12.3.2. Responsive emails which include requests made through 'Contact Us', 'Ask a Question', 'Enquiry' and 'Application' forms.
- 4.13. JMC ensures records containing personally identifiable information are protected from misuse, interference, or loss as well as unauthorised access, modification, or disclosure, and securely disposed of when no longer required in accordance with *JMC Cyber Security Policy*.
- 4.14. A person whose personal information is stored by JMC, may request that JMC not identify them and use a pseudonym.
- 4.15. Any complaints concerning privacy can be directed to the Office of the Australian Information Commissioner.

## **5. RELATED DOCUMENTS**

- 5.1. JMC Glossary
- 5.2. Records Management Policy
- 5.3. Cyber Security Policy
- 5.4. Personal Information and Privacy Policy

## **6. RELEVANT LEGISLATION**

- 6.1. Privacy Act 1988 (Cth)
- 6.2. Privacy Amendment (Private Sector) Act 2000 (Cth)
- 6.3. Copyright Act 1968 (Cth)
- 6.4. Telecommunications Act 1997 (Cth)
- 6.5. Cybercrime Act 2001 (Cth)

## **7. POSITIONS RESPONSIBLE**

- 7.1. Director of Marketing and Brand
- 7.2. Recruitment Advisors
- 7.3. Senior Management
- 7.4. JMC Staff (Non-academic)

## 8. APPROVAL INFORMATION

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## REFERENCES and ACKNOWLEDGEMENTS

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