

Privacy Policy

Centre for Customs and Excise Studies Pty Ltd

ABN 50 106 153 271

1. Our commitment to your privacy

- 1.1 Centre for Customs and Excise Studies Pty Ltd ABN 50 106 153 271 (**We/Us/Our**) **respects your privacy**. So that you may understand how we deal with your Personal Information, we have set out how and why we collect, hold, use, manage and disclose Personal Information in this Privacy Policy. You may print a copy of this Privacy Policy.
- 1.2 We will update this Privacy Policy from time to time at our discretion. The latest version will be available on this website.
- 1.3 This Privacy Policy binds our trading entities, related and affiliated companies:
- (a) if they are subject to the Privacy Act as a result of a “link” to Australia (as defined in the *Privacy Act 1988* (Cth));
 - (b) where we provide Personal Information to them to assist us in our business; or
 - (c) the *Privacy Act 1988* (Cth) otherwise binds them.
- 1.4 Our business activities and functions include:
- (a) training;
 - (b) education, including awarding qualifications;
 - (c) research,
 - (d) development and supply of products, services and software solutions to support our business,
- in the areas of customs, excise and border management.
- 1.5 This Privacy Policy relates to how we collect, hold, use, manage and disclose Personal Information that we and our trading entities, related and affiliated companies collect in our own name.
- 1.6 Where we are providing our products, services and software solutions directly to you, our products, services and software solutions may be used to hold and process Personal Information and this may include our service providers (such as PayPal) also holding and processing Personal Information. This information is

subject to the privacy policies of our service providers (and not us), and our service providers are responsible for its collection, storage, use, management and disclosure.

- 1.7 Where we are providing our products, services or software solutions to you via our distributors, resellers or other third party marketers, our products, services and software solutions may be used to hold and process Personal Information and:
- (a) this may include our service providers (such as PayPal) also holding and processing Personal Information. This information is subject to the privacy policies of our service providers (and not us), and our service providers are responsible for its collection, storage, use, management and disclosure.
 - (b) our distributors, resellers or other third party marketers may also hold and process Personal Information. This information is subject to the privacy policies of our distributors, resellers or other third party marketers (and not us), and our distributors, resellers or other third party marketers are responsible for its collection, storage, use, management and disclosure.
- 1.8 Where we are providing our products, services or software solutions in conjunction with educational institutes, the educational institutes also hold and process Personal Information. This information is subject to the privacy policies of the educational institute (and not us), and the educational institutes are responsible for its collection, storage, use, management and disclosure.
- 1.9 Some of the key phrases that are used in the Privacy Policy include “Personal Information” and “Sensitive Information”. Both of these terms are defined in the *Privacy Act 1998* (Cth).
- 1.10 “Personal Information” is defined to mean information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.
- 1.11 “Sensitive Information” is defined to mean information or an opinion about an individual’s:
- (a) racial or ethnic origin;
 - (b) political opinions;
 - (c) membership of a political association;
 - (d) religious beliefs or affiliations;
 - (e) philosophical beliefs;
 - (f) membership of a professional or trade association;
 - (g) membership of a trade union;

- (h) sexual preferences or practices;
- (i) criminal record;
- (j) health information about an individual;
- (k) genetic information about an individual that is not otherwise health information;
- (l) biometric information that is to be used for the purpose of automated biometric verification or biometric identification;
- (m) biometric templates.

2. What Personal Information do we Collect and Hold?

2.1 We may collect and hold the following types of Personal Information:

- (a) name, date of birth and relationship to other individuals (e.g. records of next of kin or contact person for employees);
- (b) address, phone number, fax number, email address, Skype address and other addresses/contact details/identifiers used in electronic communications;
- (c) voicemails that are left on our telephony system;
- (d) information submitted through our website;
- (e) information that is loaded into our products, services or software solutions;
- (f) records of educational and training courses taken, performance, results and qualifications;
- (g) data referred to under the heading Cookies, Metadata and Site Data Activity in this Privacy Policy;
- (h) credit card or details of other payment methods used on our website or to purchase our products, services or software solutions;
- (i) information supplied to us via surveys, competition entry forms, and data collection supplied via websites;
- (j) photographic images of staff, clients and of individuals supplied to us for use in connection with our business activities;
- (k) information about enquiries made to us, our suppliers or business associates;
- (l) information provided when you raise a support enquiry or when we are working with you to resolve a technical or administrative query;

(m) the content of letters and emails you send to us.

2.2 It is not common for us to collect or hold Sensitive Information. The only exceptions to this rule are:

- (a) where you voluntarily provide Sensitive Information to us;
- (b) where the Sensitive Information is directly linked to the individual's employment records and our collection, holding and use is permitted by the *Privacy Act 1988* (Cth) for the purpose managing the individual's employment record;
- (c) where Sensitive Information is provided to us in connection with the individual seeking employment, contract work, work experience or similar, whether solicited or unsolicited.

3. How do we Collect and Hold Personal Information?

3.1 We collect Personal Information in a number of ways, including:

- (a) through our website;
- (b) through communications with you, including letters, emails, telephone calls, facsimiles, surveys, competitions and via social media applications;
- (c) through communications with others;
- (d) in the course of providing our products and services to you, including providing through:
 - (1) our software solutions and support through our support service;
 - (2) education and training programs and courses;
- (e) in the course of our business functions and activities;
- (f) through communication which we conduct such as email, microsites, surveys, competitions and customer feedback.

3.2 We hold Personal Information:

- (a) in our hard copy files;
- (b) in other systems and software solutions that we use in connection with our business, some of which may be owned and operated by our suppliers;
- (c) in the database associated with our website.

3.3 Providing it is lawful and practical, we will give you the option of not identifying yourself, using a pseudonym, or not providing Personal Information when you enter into a transaction or deal with us.

- 3.4 If you elect not to provide us with Personal Information then we may not be able to provide you with the information, products, services or support that you may want.
- 3.5 We may receive other unsolicited Personal Information in the course of our business. We will deal with this unsolicited Personal Information in accordance with the *Privacy Act 1988* (Cth).

4. The Purposes for which we use Personal Information

- 4.1 We collect, hold, use and disclose Personal Information for the following purposes:
- (a) pursuing our business activities and functions, including:
 - (1) working with distributors, resellers or other third party marketers and educational institutes and/or providing our products, services and software solutions in connection with them;
 - (2) working with people and organisations who have an interest in our education and training programs and courses, and the performance, results and qualifications of those programs and courses and the individuals to take them;
 - (b) allowing the technical support personnel to provide assistance to you if needed;
 - (c) facilitating transactions between you (or other people who you are acting for) and us or between you (or other people who you are acting for) and other people and organisations who are accessible via our website or any other electronic means;
 - (d) facilitating payment for the purchase of products, services or software solutions through our website or otherwise. In this case you will be directed to (or we may use to facilitate the transaction) a third party website (a secure internet payment gateway) approved by the relevant financial institution to enter your credit/debit/charge card or other payment mechanism details. This third party may in turn integrate the payment software with a third party payment application provider who assists in managing the payment transaction;
 - (e) performing any of the features on our website, e.g. contact us or any other data collection form, conducting surveys, competition forms, mail outs, using social media;
 - (f) statistical analysis of the usage of our website, software solutions or tools that are accessed via the website;
 - (g) improving the quality or user experience of our website, products and services or software solutions;
 - (h) direct marketing;

- (i) developing or adding additional products, services or software solutions from us or existing or new people and organisations that are accessible via our website;
 - (j) training and quality assurance purposes;
 - (k) administrative purposes;
 - (l) allowing the technical support personnel to manage our infrastructure, systems, databases, products, services, software solutions, applications or tools;
 - (m) complying with the law, including privacy legislation.
- 4.2 We do not provide Personal Information to third parties except as in accordance with this Privacy Policy, any agreement we have with you or as required by law.
- 4.3 If you have given us your consent to provide you with direct marketing communications we may collect, hold, use and disclose Personal Information in accordance with that consent to enable us to provide you (or other people who you are acting for) information about, and offer you (or other people who you are acting for), products, services or software solutions.
- 4.4 If you give us consent to provide you with direct marketing communications we will provide a simple means where you can request not to receive direct marketing communications. You may also request that we do not provide your Personal Information to any of our suppliers or business associates in order for them to provide you with direct marketing communications. If we use a third party source to obtain Personal Information about you for the purpose of direct marketing to you, you may request that we disclose the source of that information. We will respond to any request made under this clause within a reasonable period and at no cost to you.
- 4.5 You consent to us using any Personal Information that we collect for any one of the purposes in this Privacy Policy for any of the other purposes stated in this Privacy Policy, other than for direct marketing.
- 4.6 If we intend to or do sell some or all of our business or its assets then we may disclose Personal Information to that potential acquirer (and their contractors/advisers) and if the sale completes we will transfer any Personal Information to the acquirer as part of that transaction.

5. Disclosure of the Personal Information Interstate and/or Overseas

- 5.1 We may send Personal Information interstate and/or overseas in the following circumstances:

- (a) where one of our trading entities, or related bodies and affiliates, and their contractors or suppliers assists us with our business activities and functions;
- (b) where we have a supplier assisting us with providing assistance with our business activities and functions. We have no control over where these suppliers hold or process their data and it is impractical for us to be able to advise you of the states, territories or countries where the Personal Information may be held or processed;
- (c) where our website, or any hosting service we use to support our software solution is hosted by us or a third party, and the hosting facilities and/or the back-up/disaster recovery sites are located interstate or overseas. We have no control over where these third party providers host the website and it is impractical for us to be able to advise you of the states, territories or countries where the Personal Information may be held or processed;
- (d) where a third party application is being used in connection with our interactions with you, e.g. when we use email or Skype the third party providers of the relevant application have their applications hosted overseas. We have no control over where these third party providers host their applications and it is impractical for us to be able to advise you of the states, territories or countries where the Personal Information may be held or processed;
- (e) where one of our distributors, resellers or marketers assists us with our business activities and functions, including distributing, marketing or promoting our software solution, products or services. In this case we use reasonable efforts to ensure that the distributor, resellers or marketers enters into an agreement with us that includes a requirement that they comply with all applicable privacy laws, however we have no control over where these distributor, resellers or marketers host our software solutions or their applications and it is impractical for us to be able to advise you of the states, territories or countries where the Personal Information may be held or processed. You should review the privacy policies and terms and conditions of use of those distributors, resellers or marketers if you use them;
- (f) where we are working with an educational institute to perform our business activities and functions, including research and development and educational programs and courses, and distributing, marketing or promoting our software solution, products or services, including educational programs and courses. In this case we use reasonable efforts to ensure that the educational institute enters into an agreement with us that includes a requirement that they comply with all applicable privacy laws, however we have no control over where these educational institutes transfer Personal Information and it is impractical for us to be able to advise you of the states, territories or countries where the Personal

Information may be held or processed. You should review the privacy policies and terms and conditions of use of those educational institutes if you use them.

- 5.2 The states, territories or countries to which we know the Personal Information may be sent include states, territories or countries where our website, databases, products, services and software solutions are hosted. Currently the locations of the primary data centres are:
- (a) Australia;
 - (b) United States.

Back up and disaster recovery data centres may be in other states, territories and countries, and data may be transmitted across the internet globally.

6. Use of Social Media

- 6.1 Our website may use social media including blogs, Twitter feeds, and links to other social media, including Facebook, LinkedIn, Twitter, Pinterest and similar sites. The nature of social media is that these applications actively enable exchange and disclosure of any information, whether personal or otherwise, that is included within those applications. All information, including Personal Information that you enter in those applications may be used, stored, handled and disclosed in any way that is consistent with the privacy policies of the relevant applications, if any. All information that is posted in a blog, twitter feed or other social media in connection with the website should be considered as public information that may be used, copied and adapted by any person for any means and should not be posted unless you are prepared to specifically state what restrictions on use there may be with that information or are prepared to accept that it may be used, copied, adapted, stored, handled and disclosed to any other person in any way.

7. Cookies, Metadata and Site Data Activity

- 7.1 A cookie is a small piece of computer code which remains on your computer and contains information which helps us identify your browser.
- 7.2 When you visit our website, software solution, applications or tools, a cookie may record the authentication to allow your user id to login. We use the information gathered by cookies to identify your web browser so that when you log in on the next occasion your use of the website, software solution, applications or tools on it is easier and faster because the website has remembered your details.
- 7.3 We also use analytic software as a service to analyse the use of our website, software solution, applications and tools and those services may place cookies on your computer in order to perform its functions.
- 7.4 If you do not want us to use cookies then you can stop them, or be notified when they are being used, by adopting the appropriate settings on your browser. If you do

not allow cookies to be used some or all of the website, software solution, applications or tools on it might not be accessible to you. You may also delete cookies that have been stored onto your computer using the functions in your browser.

- 7.5 Sometimes information that you upload is provided with associated metadata. If you do not want us to use the metadata you must remove it before uploading it onto the website, software solution, applications and tools.
- 7.6 We may collect data that is associated with your visit, including the pages your visit, the activities you do, the preferences you make, the software solution, applications and tools you use and the purchases you make and the competitions you enter etc. We may also collect information relating to the computer, mobile phone or other device including the device type, the browser, location, IP address and search words used. We may collect, use, disclose and store this information in any of the ways set out in this Privacy Policy.

8. Links to other websites and applications

- 8.1 Our website may include links to other websites, applications and tools that are not owned or operated by us. We are not responsible for the content of those websites, applications or tools, nor for any products, services or information contained in them or offered through them. You should review the privacy policies and terms and conditions of use of those websites, applications and tools when you visit them. We do not endorse, sponsor, condone or represent the companies or content that is contained in any linked website, and reserve the right to terminate any link or linking program at any time.

9. How to access and seek correction of your Personal Information or complain

- 9.1 If you want to find out what Personal Information we hold on you or you believe any of your Personal Information that is held by us is inaccurate, out of date, incomplete, irrelevant or misleading or it is not necessary for us to continue to hold it, you can contact us, and we will either provide you with access to the Personal Information (in so far as we are required to do so by law,) or we will correct it, as applicable, within a reasonable period. We may make a reasonable charge for giving you access to your Personal Information, but we will not charge for you making the request, correcting Personal Information or making a statement as to why we are not correcting your Personal Information. You can contact us by:
- (a) email at the following email address: customs@csu.edu.au;
 - (b) using the Contact Us web form on our website at <http://customscentre.com/contact-us/> .

9.2 If you wish to complain about a breach of any Australian Privacy Principle that binds us, a registered privacy code that binds us, or this Privacy Policy you should contact us by:

(a) email at the following email address: customs@csu.edu.au ;

(b) using the Contact Us web form on our website at <http://customscentre.com/contact-us/> .

9.3 We will use our best efforts to respond to any complaint within 10 business days of the date of receipt. We will attempt to resolve your complaint to your satisfaction. If you are not satisfied with how we deal with your complaint you may contact the Australian Information Commissioner, whose contact details can be found at <http://www.oaic.gov.au>