

## St Mark's College, Adelaide

### Privacy Policy

St Mark's College Incorporated (the College) is committed to protecting personal information about its past and current members, as well as those who are or have been a part of the College community. This is undertaken in line with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). The College takes all reasonable steps to comply with the legislation and the APPs to protect the privacy of any information the College may hold.

### Why the College collects personal information

In general, the College collects personal information in order to:

- assess applications – e.g. for resident membership, employment, scholarships, and financial assistance;
- assist in residency – e.g. room allocation, medical assistance, potential interests in cultural or other activities;
- provide references;
- provide information for the alumni and friends database;
- provide an academic development program to suit students' needs;
- assess students' performance or conduct at the College or at university;
- pay accounts and collect monies pursuant to the Student Agreement or other residential contract;
- promote College activities on the College's website or in other ways;
- provide a safe environment for staff, students, and visitors to the College; and
- other related purposes.

The College engages in fundraising activities and events and is a registered Deductible Gift Recipient (DGR). In this context, the College collects personal information in order to manage:

- donor mailouts;
- fundraising and other events;
- bequests;
- scholarship program;
- Annual Giving and other donation programs;
- corporate relationships.

### The types of information the College collects

The College may request a range of information in the conduct of its business.

### Personal information

Personal information is recorded information which directly or indirectly identifies a person. This information may include a student's contact details, academic results, references, photos

and videos, and any other relevant information obtained by the College that is reasonably necessary for, or directly related to, one or more of the College's functions or activities.

Health information is information about a person's physical or mental health, disabilities, or health services received, and other information collected while providing services.

Failure by you to provide personal information when requested by the College may mean that the College is unable to assess your application for residency.

### **Student's sensitive information**

In addition to collecting personal information directly from you, the College may also obtain sensitive personal information about you that is reasonably necessary for, or directly related to, one or more of the College's functions or activities.

### **Donor Information**

When you make a donation to the College, a receipt is provided. Your details are held securely and are only used for fundraising activities. We understand that there may be times when you are not able to make a gift. You can ask the College not to contact you or not to ask for a donation, and the College will respect your wish.

The College may collect information for statistical purposes about services provided and demographic data (optional), so it can tailor the information it provides to its supporters.

The College collects financial information (such as credit card information) in order to receive payment for donations. Donor details are held securely and are only used for intended fundraising activities.

The College is bound by taxation law and the ACNC (Australian Charities and Not-for-Profits Commission) Act in relation to reporting and record keeping obligations.

The College will not give public recognition of any donation where the donor has requested anonymity.

The College's online facility for donations is secure and encrypted. Any and all data stored on the College's systems is password protected.

The College will not use or release donor information about individual visits to the website or information that the donor may provide electronically to any other organisation, person, or group without the express consent of the donor.

A donor has the right to make a request of the College to access their personal information which is being held by the College. This request is to be made in writing and the information will be provided at no charge to the donor.

A donor has the right to make a request to make amendments to the donor's records held by the College if these records are in the donor's opinion incomplete, incorrect, out-of-date, or misleading.

The College is committed to protecting and maintaining the privacy, accuracy, and security of all donor information including the financial level of their support and will not exchange, rent, or otherwise share donor contact details with another person or body corporate without the express written consent of the donor.

### **Sensitive information**

Business and personal information may be obtained as part of the business operations of the College, including: name, position, organisation, ABN/ACN (where applicable), postal and business address, phone and fax numbers, email address. In some circumstances, for example, where an individual or business is purchasing a product from the College or paying a fee to the College, credit card details or bank details may also be collected.

### **How the College collects and uses personal information**

The College collects personal information from a variety of sources, such as when individuals:

- make an application for resident membership of the College;
- receive a service;
- attend a fundraising event or activity;
- respond to a mailing program;
- voluntarily provide the College with personal information;
- make a donation to the College;
- become employees or volunteers of the College.

### **Management of student personal information**

The College recognises and respects every individual student's right to privacy, dignity, and confidentiality in all aspects of their life. The College makes all reasonable efforts to ensure that all students and their families enjoy:

- freedom from intrusion and public attention;
- being treated with respect and dignity;
- an assurance that written and spoken information is protected from access and use by unauthorised persons.

### **Treatment as confidential information**

The College treats personal and sensitive information which it collects from individuals in the same way it treats other confidential information and does not sell to anyone the information it collects.

The College will not disclose to a third party the information it collects, except where it is necessary for consultants or contractors performing services for the College, or to fulfil other obligations of the College. In such circumstances third parties must have given an appropriate confidentiality undertaking or have a privacy policy which is similar to the College and complies with the legislation.

Your personal information may be disclosed to College Board members, Fellows, tutors, employees, insurers, auditors and legal advisors of the College, relevant staff of the universities, and any person who has a lawful entitlement to obtain the information.

The College does not disclose telephone numbers or email addresses to any callers, except as provided for in this policy.

Personal files of current students are held in hard copy and/or electronic form.

Details of personal records will not be disclosed to relatives without the student's written permission, except at the discretion of the College in an emergency or equivalent.

Personal information of former students is kept in the College's archive and electronically on the alumni database.

Photographs and videos that are considered to be sensitive information will only be published on the College's website when the College has received consent to do so.

### Secondary use of information

The College may use or disclose personal information which it collects from you for a purpose (the "secondary purpose") which is different from the primary purpose of collection, if it is permitted under the Privacy legislation, only for example if:

- the information is health information – for example, the use or disclosure is necessary for research or the compilation or analysis of statistics relevant to public health or safety;
- you would reasonably expect the College to so use or disclose such information;
- you have given the College specific consent to do so;
- the College is required to do so by law;
- it is necessary to prevent a serious threat to the life or health or safety of a person; or
- it is a necessary part of an investigation of unlawful activity or other alleged misconduct.

### Protection of your personal information

The College uses a number of measures to protect each individual's personal information from misuse, loss, unauthorised access, modification, or improper disclosure. This includes a network system firewall that is designed to protect information held within the information systems network by preventing unauthorised access to the network. The College's data management systems and procedures ensure that personal information is handled in a way that is consistent with its Privacy Policy.

### Disclosure of personal information to overseas recipients

The College will not transfer personal information overseas until the College has taken reasonable steps to ensure that the information which is being transferred will not be held, used, or disclosed by the recipient of the information inconsistently with the legislation.

The countries in which such recipients are likely to be located cover a range of countries and it is therefore not practicable to specify those countries in this policy.

### Your right to removal from communication lists

Should you wish to be removed from the College's communication list when you are no longer a resident student of the College, you may request this by email to [stmarks@stmarkscollege.com.au](mailto:stmarks@stmarkscollege.com.au), and the College will endeavour to act on this request immediately.

### Your right to access and correct information

The College will take all reasonable steps to ensure that personal information which the College collects, uses, or discloses is accurate, complete, and up to date.

Individuals have the right to access the personal information the College holds about them. If the information the College holds is not accurate, complete, and up to date, individuals can ask the College to modify its records.

If you consider that the personal information which the College holds about you is not accurate, complete, and up to date, and the College refuses your request to modify its records, the College will write to you stating clearly why the personal information held should not be amended.

You can make a request to access the information the College keeps about you by contacting the Head of College.

### The College's right to refuse

Access to information relating to a student may be refused in circumstances prescribed by applicable legislation including where a treating medical practitioner agrees that access would prejudice the individual's physical or mental health, or put another person at harm.

If you are a member of the College and you believe information the College holds about you is incorrect, please let the College know and the College will verify and where applicable correct the information.

### Using the College's website/contacting the College by email

The College will ordinarily only record your email address if you provide it or if you send the College a message. It will ordinarily only be used for the purpose for which it was provided – for example, seeking further information about the College's services or making a referral for yourself or another individual. The College will not disclose your email address without consent, or if required for a legally authorised purpose.

By using the College's website, and voluntarily providing the College with personal information, you consent to the collection, use, and disclosure of personal information in the manner described in this Privacy Policy.

### Anonymity

If you wish to remain anonymous or use a pseudonym when dealing with the College as a donor, we will attempt to fulfil your request. However, it may not be practicable to assist you depending on your need.

## Use of cookies

Cookies are pieces of information that a website transfers to a computer's hard disk for record-keeping purposes. Most web browsers are set to accept cookies. The College uses cookies to make use of the College's website and services as convenient as possible. Cookies do not themselves personally identify users, although they do identify a user's browser. Cookies enable the College to record how many people are using the different parts of the site. It is possible to set the browser to refuse cookies, however, this may limit the services provided by the College's website.

## Links to other websites

The College's website contains links to other sites. The College is not responsible for the privacy practices of other websites and their operators.

## How you may complain about a breach of privacy

Any complaints received by the College will be referred for prompt investigation by the Head of College and/or College Board, and a written response will be provided to you as soon as possible.

If you are not satisfied with the outcome of your complaint, you can then refer the matter to the Privacy Commissioner (Office of the Australian Information Commissioner) via telephone on 1300 363 992 or via the website <https://www.oaic.gov.au/privacy/privacy-complaints>.

## Contact details

The College encourages you to check this Privacy Policy periodically as it may be updated from time to time. If you have any questions or comments about the College's Privacy Policy, the practices of the College's website, to access or change your details, or to register an issue in relation to the way the College has dealt with your privacy, please contact the Head of College:

Mail: 46 Pennington Terrace, North Adelaide, South Australia 5006

T: +61 8 8334 5600

Email: [stmarks@stmarkscollege.com.au](mailto:stmarks@stmarkscollege.com.au)

## Policy Review

This policy will be reviewed on an annual basis at the start of each year, prior to publication, to ensure that it is compliant with best practice management and the College's legal obligations. This policy may be reviewed and revised at other times also.

**Policy last updated:** January 2025

**Policy authorised by:** Head of College

**Date to be reviewed:** January 2026