

## Privacy Policy

### **Introduction**

World Education Australia Limited (“World Education Australia”, ‘we’, ‘our’, ‘us’) is committed to the protection of personal information in accordance with the Privacy Act 1988 (Cwth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cwth) (‘Privacy Acts’).

This Privacy Policy outlines how we collect, store, use and manage your personal information. “Personal information” means information or an opinion recorded about an individual that makes the individual’s identity reasonably apparent or ascertainable. This Privacy Policy does not seek to replace or limit the requirements of the Privacy Acts.

This Privacy Policy applies to World Education Australia Limited ACN 106 279 225 trading as World Education Australia and as Good Return, and reference in this Privacy Policy to one includes the other.

World Education Australia is a registered Australian charity that provides people living in poverty with access to responsible microfinance and skills development opportunities.

If you have any questions about this policy, please contact us.

### **Collection and storage of personal information**

We will only collect personal information that is related to and necessary for our dealings with you. The type of information we collect for the above purposes includes, but may not be limited to: information you provide to us at our request (for example, your name and contact details); and information we have acquired because you have accessed our web site, or have sent or received an electronic communication to or from us. Such information might include your e-mail address, the web pages you access while on our website, and the websites you access before and after accessing our website. We do not collect your credit card details, since we use a ‘payment gateway’, currently PayPal, for the purpose of processing your payments to us.

We will only use your personal information for the purposes of our activities as described above or of providing you with information on these activities unless:

- you consent (expressly or impliedly) to our using your personal information for other purposes; or
- its use is required or permitted by law.

We regularly backup our data (which includes your personal information) and store it ‘in the cloud’. This means that our data may be held outside Australia, although all data is encrypted during the upload/download process.

We may from time to time extract information from the website or from our electronic communication system in reports, print them and destroy them, as well as extracting and loading information for marketing mail-out purposes. In such cases, the data would be ‘in the cloud’ for a short period of time.

### **Accuracy and completeness of personal information**

We will assume that any personal information you provide is up to date, complete, free from errors and omissions, is not misleading or deceptive, and complies with all relevant laws.

We may not check or verify the accuracy of any personal information we obtain from you or other persons.

We rely on the personal information you provide and ask that any changes be updated as soon as reasonably practicable.

### **Disclosure of personal information**

Personal information will not be disclosed by us to a third party unless:

- disclosure is necessary for us to collect your personal information to carry out one or more of our functions or activities;
- it is being used for the purposes set out in this Privacy Policy;
- you have been informed of the disclosure at the time the personal information is collected from you;
- disclosure is to our business associates and others, for purposes directly related to the purpose for which the personal information is collected (eg to overseas microfinance institutions, whose identity and locations are obtainable from our website [www.goodreturn.org](http://www.goodreturn.org));
- to our professional advisors and other contractors (such as IT consultants);
- you consent (expressly or impliedly) to or request it to be disclosed; or
- disclosure is required or permitted by law.

We may also obtain personal and other information to enable us to provide our services or products to you.

When you provide to us the personal information of third parties we will assume, and you will ensure, that you have made that third party aware of the referral, collection, use and disclosure of their personal information.

Unfortunately, because of:

- the nature of our dealings with you and the personal information we require in order to conduct those dealings, and
- the provisions of Australia's anti-money laundering and counter terrorism financing (AML/CTF) legislation and its customer due diligence (CDD) regime,

it is not possible for us to give you the option of not identifying yourself when dealing with us, or of using a pseudonym. There is an option on the Good Return website, once you have provided your personal information to us, for you to remain anonymous. We do not share information about donors publicly.

### **Accessing personal information**

If you wish to access your personal information held by us, complain about possible breaches of privacy, or make a privacy related enquiry, please contact:

Information Officer

World Education Australia Limited

PO Box 479 St Leonards NSW 2065

Phone: (02) 9114 8111

E-mail: [emailus@goodreturn.org](mailto:emailus@goodreturn.org)

We may ask you to put your access request in writing and may also ask you to pay a reasonable fee to defray the cost of accessing your personal information.

We will endeavour to respond to your access request, enquiry, or complaint as soon as reasonably possible. However, we may not be able to require our contractors or third parties to provide personal information to you.

If you are unsatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) or on 1300 363 992.

Information on how we deal with complaints generally is contained in our Complaints Policy which is posted on our website.

### **Variation of this Privacy Policy**

We may vary the terms of this Privacy Policy at any time, but our current Privacy Policy will be the version contained on our website.

### **Collection of other than personal information**

If you visit our website or send or receive an electronic communication to or from us, some of the information we collect about your visit is not personal information because it does not reveal your identity. Information of this nature can include:

#### **Activity information**

When you visit our website or send or receive an electronic communication to or from us, we collect general information about your activity. This may include the date and time of your visit, the pages you accessed, and the information you downloaded. In the case of an electronic communication, we track impressions and clicks on the parts of our email signature that encourage users to visit our website and social network accounts.

We use this information in anonymous and aggregated form, for statistical purposes only, to assist us in improving the quality and usability of our website.

#### **Cookies**

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use may identify individual users.

Cookies can either be “persistent” or “session” based. Persistent cookies are stored on your computer, contain an expiration date, and are mainly for the user’s convenience. Session cookies are short-lived and are held in your browser’s memory only for the duration of your session. They are used only during a browsing session, and expire when you quit your browser.

We may use both session and persistent cookies. This information may be used to personalise your current visit to our websites. Upon closing your browser, the session cookies are destroyed.

Most internet browsers can be set to accept or reject cookies. If you do not want to accept cookies, you can adjust your internet browser's security settings to reject cookies or to notify you when they are being used.

### **Security on our website**

We use secure online payment technology called Secure Socket Layer ("SSL"). SSL works by encrypting all communications between your computer and our web server. When your browser is operating in a secure fashion, you will see the security status of the key/broken key icon change in the status area of your browser. If your browser is SSL equipped, your transaction will be secured immediately.

If you use the internet, you are using facilities that are beyond our control and there are always risks associated with transferring data. Remember, however, that we use a 'payment gateway' in order to process financial transactions with you through our website, and we do not collect or store your credit card details.

Any of your personal information that we hold in our computer systems is made more secure from unauthorised access by a range of internal security mechanisms and procedures.

If you become aware of any security breach, please let us know as soon as possible by using the information on our contact page.

World Education Australia Limited, Sydney

15 July 2016