

Privacy Policy

Privacy Policy

Purpose:	The Men of Business Academy is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the school and describes how the school uses and manages personal information provided to or collected by it.	
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the school site; and describes the type of information the school collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.	
Status:	<input checked="" type="checkbox"/> Draft <input type="checkbox"/> Approved	Supersedes: 2024 Privacy Policy
Authorised by:	Executive Manager – Jason Sessarago	Date of Authorisation: 16/05/2025
References:	<ul style="list-style-type: none"> • Australian Privacy Principles • Privacy Act 1988 (Cth) • Men of Business Academy's Child Protection Policy • Men of Business Academy's Student Disability Discrimination Policy • Men of Business Academy's Student Disability Framework 	
Supersedes:	2024 Men of Business Academy Privacy Policy	
Review Date:	Annually, as appropriate, to take account of new laws and technology, changes to school's operations and practices and to make sure it remains appropriate to the changing environment.	Next Review Date: 16/05/2026
Policy Owner:	MOB Australia trading as Men of Business Academy – Board of Directors	

Exception in Relation to Employee Records:

Under the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to Men of Business Academy's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Men of Business Academy and an employee.

Policy

This Privacy Policy sets out how Men of Business Academy manages personal information provided to or collected by it. Men of Business Academy is bound by the Australian Privacy Principles contained in the *Privacy Act*. Men of Business Academy may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Men of Business Academy's operations and practices and to make sure it remains appropriate to the changing school environment.

What kinds of personal information does the School collect and how does the School collect it?

The type of information Men of Business Academy collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at Men of Business Academy:
 - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
 - parents' education, occupation and language background;
 - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - conduct and complaint records, or other behaviour notes, and school reports; information about referrals to government welfare agencies;
 - counselling reports;
 - health fund details and Medicare number;
 - any court orders;
 - volunteering information; and
 - photos and videos at school events.
- job applicants, staff members, volunteers and contractors:
 - name, contact details (including next of kin), date of birth, and religion;
 - information on job application;

- professional development history;
 - salary and payment information, including superannuation details;
 - medical information (e.g. details of disability and/or allergies, and medical certificates);
 - complaint records and investigation reports;
 - leave details;
 - photos and videos at school events;
 - workplace surveillance information;
 - work emails and private emails (when using work email address) and Internet browsing history
- other people who come into contact with the Men of Business Academy including name and contact details and any other information necessary for the particular contact with the school.

Personal Information you provide:

Men of Business Academy will generally collect personal information held about an individual by way of forms filled out by parents/guardians or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents/guardians and students provide personal information.

Personal Information provided by other people:

In some circumstances Men of Business Academy may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

How will Men of Business Academy use the personal information you provide?

Men of Business Academy will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

Students and Parents

In relation to personal information of students and parents/guardians, Men of Business Academy's primary purpose of collection is to enable Men of Business Academy to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the school. This includes satisfying the needs of parents/guardians, the needs of the students and the needs of Men of Business Academy throughout the whole period the student is enrolled at the Men of Business Academy.

The purposes for which Men of Business Academy uses personal information of students and parents/guardians include:

- to keep parents/guardians informed about matters related to their student's schooling, through correspondence, newsletters and magazines
- day-to-day administration of Men of Business Academy
- looking after student's educational, social and medical wellbeing
- seeking donations and marketing for Men of Business Academy
- to satisfy Men of Business Academy's legal obligations and allow the school to discharge its duty of care.

In some cases where Men of Business Academy requests personal information about a student or parent/guardian, if the information requested is not provided, Men of Business Academy may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

On occasions information such as academic and sporting achievements, student activities and similar news is published in school newsletters and magazines, on our MOB App, on our school website and school social media pages, this may include photographs and videos of student activities such as sporting events, school camps and school excursions. The Men of Business Academy will obtain permissions annually from the student's parent/guardian (and from the student if appropriate). If Men of Business Academy would like to include photographs or videos (or other identifying material) of a student in any promotional material or otherwise make this material available to the public as part of a media campaign, it will seek written approval from a student's parent/guardian (and from the student if appropriate) prior to publication.

Job applicants, Staff Members and Contractors

In relation to personal information of job applicants, staff members and contractors, Men of Business Academy's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which Men of Business Academy uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be
- for insurance purposes
- seeking donations and marketing for the Men of Business Academy
- to satisfy the Men of Business Academy's legal obligations, for example, in relation to child protection legislation.

Volunteers

The Men of Business Academy also obtains personal information about volunteers who assist Men of Business Academy in its functions or conduct associated activities, such as alumni associations, to enable Men of Business Academy and the volunteers to work together.

Marketing and Fundraising

Men of Business Academy treats marketing and seeking donations for the future growth and development of the school as an important part of ensuring that Men of Business Academy continues to provide a quality learning environment in which both students and staff thrive. Personal information held by Men of Business Academy may be disclosed to organisations that assist in the school's fundraising, or, on occasions, external fundraising organisations.

Parents/guardians, staff, contractors and other members of the wider school community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

If you would like to opt-out of direct marketing, please contact the principal via the following email address: principal@menofbusiness.com.au.

Who might the School disclose Personal Information to and store your information with?

Men of Business Academy may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes. This may include to:

- another school or staff at another school
- government departments (including for policy and funding purposes)
- medical practitioners
- people providing educational, support and health services to the Men of Business Academy, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- people providing administrative and financial services to Men of Business Academy

- recipients of school publications, such as newsletters and magazines
- students' parents or guardians
- anyone you authorise Men of Business Academy to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Sending and Storing Information Overseas

Men of Business Academy may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange.

However, Men of Business Academy will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Men of Business Academy may use online or 'cloud' service providers to store personal information and to provide services to Men of Business Academy that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.**

An example of such a cloud service provider is Microsoft. Microsoft provides the 'Microsoft 365' platform, and stores and processes limited personal information for this purpose. Men of Business Academy personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Microsoft 365 and ensuring its proper use. The data centers where the personal information is likely to be kept are located in Australia - East Coast.

**If applicable

Sensitive Information

In referring to 'sensitive information', Men of Business Academy means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is required by law.

Management and Security of Personal Information

Men of Business Academy staff are required to respect the confidentiality of students' and parents'/guardians' personal information and the privacy of individuals. Men of Business Academy has in place steps to protect the personal information Men of Business Academy holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

Data Breaches

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (**the affected individuals**)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result
- the information is lost in circumstances where:
 - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
 - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

What must the school do in the event of an 'eligible data breach'?

If Men of Business Academy suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days. If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then Men of Business Academy will be required to lodge a statement to the Privacy Commissioner (**Commissioner**). Where practical to do so, the Men of Business Academy will also notify the affected individuals. If it is not practicable to notify the

affected individuals, Men of Business Academy will publish a copy of the statement on its website, or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and Correction of Personal Information

Under the *Privacy Act*, an individual has the right to seek and obtain access to any personal information which Men of Business Academy holds about them and to advise Men of Business Academy of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents/guardians, but older students may seek access and correction themselves.

To make a request to access or to update any personal information Men of Business Academy holds about you or your child, please contact the school's administration in writing via the following email: admin@menofbusiness.com.au. Men of Business Academy may require you to verify your identity and specify what information you require. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

The Men of Business Academy will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

Consent and Rights of Access to the Personal Information of Students

Men of Business Academy respects every parent's/guardian's right to make decisions concerning their student's education. Generally, Men of Business Academy will refer any requests for consent and notices in relation to the personal information of a student to the student's parents/guardians. Men of Business Academy will treat consent given by parents as consent given on

behalf of the student, and notice to parents/guardians will act as notice given to the student.

As mentioned above, parents/guardians may seek access to personal information held by Men of Business Academy about them or their student by contacting the school's administration in writing via the following email:

admin@menofbusiness.com.au. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the Men of Business Academy's duty of care to a student.

The Men of Business Academy may, at its discretion, on the request of a student grant that student access to information held by Men of Business Academy about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents/guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Enquiries and Complaints

If you would like further information about the way Men of Business Academy manages the personal information it holds, or wish to make a complaint about Men of Business Academy's breach of the Australian Privacy Principles please contact the principal via email: principal@menofbusiness.com.au. Men of Business Academy will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

APPENDIX 1

Standard Collection Notice

- 1 The School collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the Men of Business Academy. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the Men of Business Academy to provide schooling to students enrolled at the school, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students to take part in all the activities of the Men of Business Academy.
2. Some of the information we collect is to satisfy the Men of Business Academy's legal obligations, particularly to enable the school to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection* laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988*. We may ask you to provide medical reports about students from time to time.
5. The Men of Business may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
 - other schools and teachers at those schools;
 - government departments (including for policy and funding purposes);
 - medical practitioners;
 - people providing educational, support and health services to the Men of Business Academy, including specialist visiting teachers, sports coaches, volunteers, and counsellors;
 - providers of learning and assessment tools;
 - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
 - people providing administrative and financial services to the Men of Business Academy;
 - anyone you authorise the Men of Business Academy to disclose information to; and
 - anyone to whom the Men of Business Academy is required or authorised by law, including child protection laws, to disclose the information.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. The Men of Business Academy may use online or 'cloud' service providers to store personal information and to provide services to the school that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited

personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the Men of Business Academy's use of online or 'cloud' service providers is contained in the Men of Business Academy's Privacy Policy.**

8. The Men of Business Academy's Privacy Policy, accessible on the school's website www.menofbusiness.com.au, sets out how parents or students may seek access to and correction of their personal information which the Men of Business Academy has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the school's duty of care to a student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
9. The Men of Business Academy's Privacy Policy also sets out how parents/guardians and students can make a complaint about a breach of the APPs and how the complaint will be handled.
10. The Men of Business Academy may engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the Men of Business Academy's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
11. On occasions information such as academic and sporting achievements, student activities and similar news is published in school newsletters and magazines, on our MOB App, on our school website and school social media pages, this may include photographs and videos of student activities such as sporting events, school camps and school excursions. The Men of Business Academy will obtain permissions annually from the student's parent/guardian (and from the student if appropriate). If Men of Business Academy would like to include photographs or videos (or other identifying material) of a student in any promotional material or otherwise make this material available to the public as part of a media campaign, it will seek written approval from a student's parent/guardian (and from the student if appropriate) prior to publication.
12. If you provide the Men of Business Academy with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the school and why.

* As appropriate

** If applicable

APPENDIX 2

Alumni Association Collection Notice

1. The Men of Business Academy Alumni may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Men of Business Academy and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the Men of Business Academy Alumni.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by Men of Business Academy to assist in its fundraising activities. If you do not agree to this, please advise us now.
4. [The Men of Business Alumni/We] may publish details about you in our school newsletters and magazines, on our MOB App, social media pages and website. If you do not agree to this, you must advise us now.
5. The Men of Business Academy's Privacy Policy, accessible on the school's website www.menofbusiness.com.au, contains details of how you may seek access to and correction of your personal information which the school has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
6. The Men of Business Academy may use online or 'cloud' service providers to store personal information and to provide services to the school that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the Men of Business Academy's use of on online or 'cloud' service providers is contained in the Men of Business Academy's Privacy Policy. *
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the school and why.

* If applicable

APPENDIX 3

Employment Collection Notice

1. In applying for this position, you will be providing Men of Business Academy with personal information. We can be contacted via the following email: humanresources@menofbusiness.com.au. 07 5613 2093.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The Men of Business Academy's Privacy Policy, accessible on the school's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the Men of Business Academy has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted. We usually disclose this kind of information to the following types of organisations including but not limited to ICT provider, employee management platform, learning management platform and compliance platform.
5. We are required to conduct a criminal record check to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws*. We may also collect personal information about you in accordance with these laws. *
6. The Men of Business Academy may use online or 'cloud' service providers to store personal information and to provide services to the school that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the Men of Business Academy's use of online or 'cloud' service providers is contained in the Men of Business Academy's Privacy Policy. *
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the school and why.

* If applicable

APPENDIX 4

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the Men of Business Academy, you will be providing Men of Business Academy with personal information via the following email:
humanresources@menofbusiness.com.au. 07 5613 2093.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for 5 years.
4. The Men of Business Academy's Privacy Policy, accessible on the school's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the Men of Business Academy has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to. We usually disclose this kind of information to the following types of organisations including but not limited to ICT provider, employee management platform, learning management platform and compliance platform.
6. We are required to conduct a criminal record check collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law.
* We may also collect other personal information about you in accordance with these laws. *
7. The Men of Business Academy may use online or 'cloud' service providers to store personal information and to provide services to the school that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the Men of Business Academy's use of online or 'cloud' service providers is contained in the Men of Business Academy's Privacy Policy. *
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the school and why.

* If applicable