

Any personal information that you provide to Catapult when using its products, services or websites is governed by this Privacy Policy.

Please ensure that you read this Privacy Policy carefully and understand the purposes for which personal information provided to Catapult may be collected, stored, used and disclosed.

To explain some of the terminology which commonly appears in this Privacy Policy:

Personal information is information or an opinion that identifies you, or from which your identity can be reasonably ascertained, irrespective of whether the information or opinion is true or not, and regardless of the form that it is recorded in.

Sensitive information is an important type of personal information relating to your:

- biometrics;
- criminal record;
- genetics;
- health;
- membership of a political association;
- membership of a professional or trade association;
- membership of a trade union;
- philosophical beliefs;
- political opinions;
- racial or ethnic origin;
- religious beliefs or affiliations; or
- sexual orientation or practices.

Catapult may amend this Privacy Policy from time to time. Any amended Privacy Policy will be displayed on our website and a copy can be made available upon request.

1. What personal information does Catapult collect?

Catapult may collect personal information when you access its web applications, websites, products or services. Where possible, Catapult will collect the information directly from you. In some instances, Catapult may collect personal information from secondary mediums such as training organisations, trainers, administrators, students and the general public. If that occurs, it will endeavour to verify those details with you, wherever practicable.

Personal information may include names, addresses, dates of birth, answers to identity verification questions, examination results, grades, messages, feedback, access and submission logs, information regarding student enrolments and other users, and any other information you provide to us when acquiring our products and services.

If sensitive information is collected by Catapult, it will not be used for any purpose without the express permission of the individual (except where otherwise permitted by law).

2. How does Catapult use personal information?

As part of providing a Learning Management System (**LMS**) or any of its other products / services, Catapult may use the personal information you submit to:

- administer its systems;
- provide its training products and services, including training and learning tools;
- produce records of competence;
- store, transmit and collate student enrolments, submissions, grades, examination results, messages and feedback;
- transmit messages between administrators, students, trainers and organisations;

- transfer data to your chosen integrator;
- provide information in relation to our products or services, including those we consider may be of interest to you in the future;
- conduct client/customer satisfaction surveys and promotional events, such as a loyalty program;
- process payments;
- generate statistical studies;
- conduct market research;
- improve its products and services;
- conduct product upgrades and updates; or
- advise you of seminars and conventions or any other changes within Catapult that may affect you.

3. Direct marketing

Catapult may collect, store and use your personal information to market our products and services to you, where you have provided your implied or express consent for us to do so. Consent may be implied when you have purchased products or services from us, joined one of our loyalty programs, or where you have enquired about products or services that we provide.

You may always opt out of receiving marketing material by contacting us directly, using the details provided in this Privacy Policy, or using the method that is provided in any electronic marketing communications to you.

We will not disclose your personal information to a third party for the purposes of marketing their products or services to you, without your consent.

4. Disclosure to third parties

Catapult may disclose your personal information to:

- our related parties;
- other companies or individuals that assist us to provide our products or services, or to administer our internal operations. This includes:
 - electronic transactions / payment service providers, to process orders for our products and other services;
 - administrators, trainers, training organisations and other third party providers of student management systems, training management systems or other databases and systems used by your training organisation;
 - government authorities or other agencies where the disclosure is required or authorised by law;
 - prospective purchasers of all or substantially all of our assets, in the event of a merger, re-organisation or acquisition of our business or assets;
 - information technology/cloud service providers, such as persons who develop any of the software used by our business;
 - external business advisors, such as auditors and lawyers; and
 - anyone else to whom you authorise us to disclose your personal information.

There are also a limited number of circumstances in which the *Privacy Act* permits the use or disclosure of your personal information, without your consent. An example of this is where the use or disclosure is necessary to prevent a serious and imminent threat to any person's life, health or safety or a serious threat to public health or safety.

5. Cross-border disclosure of personal information

Catapult will take reasonable steps to ensure that, if we disclose your personal information to an offshore recipient, the offshore recipient does not breach the *Australian Privacy Principles (APPs)* in relation to your personal information, except where:

- we reasonably believe the offshore recipient is subject to privacy laws in their foreign country which are consistent with the APPs, and you have access to mechanisms in that country for the enforcement of those privacy laws to protect your information;
- we are legally permitted or required to make that offshore disclosure;
- we inform you that we will not take reasonable steps to ensure that the offshore recipient does not breach the APPs, and you nevertheless consent to the disclosure; or
- the *Privacy Act 1988 (Cth)* otherwise permits the offshore disclosure.

We may also store and process personal information at offshore locations, including cloud database or computing facilities provided by third parties. By providing your personal information to us, you consent to your personal information being disclosed offshore for this purpose.

6. Can you access the information that Catapult holds?

Catapult will deal with your requests for access to personal information that we hold about you.

All requests must be made in writing, and in the appropriate form specified by us from time to time. On receipt of an application, and within a reasonable timeframe, we will take reasonable steps to inform you of what personal information we hold.

We will ordinarily grant access to the personal information unless:

- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- we are unable to verify your identity;
- we are entitled to reject your access to the personal information pursuant to any law; or
- the access would be unlawful.

We reserve the right to charge a reasonable fee for providing access to the personal information, but not for making the application or correcting personal information held by us. We may withhold access to the personal information until the fee is paid.

7. What is Catapult's commitment to data security?

Catapult will take all reasonable steps to protect the security of the personal information that it holds. Catapult recognises your concern as to security, and will use reasonable efforts to establish secure connections with you and to limit access to the databases that hold your personal information, to authorised personnel only.

We have in place user names, passwords and access restrictions that provide electronic protection of personal information stored electronically. There are inherent risks with the transmission of data over the internet. Whilst reasonably appropriate security measures are in place for the protection of your personal information, you must be aware that no guarantee is made that your personal information is completely secure.

In the event of any unauthorised access and/or disclosure of your personal information, we comply with our obligations under the *Privacy Act* in dealing with any such unauthorised access and/or disclosure, including any obligations which may arise in respect of eligible data breaches within the meaning of the *Privacy Act*.

8. Does Catapult use cookies?

'Cookies' give users a unique, random ID by storing small text files onto a user's computer hard drive with the user's browsers. Cookies enable the website to track a user's activities on a website.

Cookies on the Catapult website do not collect personal information which identifies users. It is possible to disable cookies by adjusting your internet browser's settings.

9. Rights to deal anonymously / with a pseudonym or to refuse provision of personal information

You may refuse to provide personal information to Catapult. However, if you exercise this right of refusal, it may affect our ability to meet our obligations to you or to a third-party agency.

You may also deal with Catapult anonymously or by using a pseudonym. However, if you do so, we may be prevented from providing you with accurate or useful information, and you may not be able to access our full range of products or services.

10. What are Catapult's contact procedures?

If you believe that Catapult has not adhered to this Privacy Policy, or you would like to be removed from Catapult's mailing lists, or you would like to update / correct your personal information, you may notify Catapult by email, telephone or post at the below details. Catapult takes all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous, vexatious or without legal or factual merit.

You may also contact the Office of the Australian Information Commissioner if you want to know more about privacy rights. Its website address is <https://www.oaic.gov.au>

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