

## Privacy Policy

Clasity Pty Ltd ACN 168 177 259, trading as BlueQ (**we, us, our** or **BlueQ**) provides an online qualification and credential management platform to enable individuals and organisations to digitise, store and manage qualifications, credentials and other similar documents (**BlueQ Application**).

### PURPOSE OF OUR POLICY

- This Privacy Policy sets out how we aim to comply with the 13 Australian Privacy Principles under the *Privacy Act 1988* (Cth) (**Privacy Act**).
- We have adopted this Privacy Policy to ensure that we have a policy in place to communicate to our customers about how we collect, handle, use, disclose and manage Personal Information that is necessary and incidental to:
  - Providing the systems, goods and services that BlueQ offers to its customers or prospective customers (including access to and use of the BlueQ Application); and
  - The normal day-to-day operations of our business.
- By publishing this Privacy Policy we aim to make it easy for our customers and the public to understand what Personal Information we collect and store, why we do so, how we receive and/or obtain that information, and the rights an individual has with respect to their Personal Information in our possession.

### WHO AND WHAT THIS POLICY APPLIES TO

- Our Privacy Policy deals with how we collect, use, disclose and store “personal information” as it is defined in the Privacy Act. Under the Privacy Act, personal information is information or an opinion about an identified, or reasonably identifiable, individual (**Personal Information**).
- We handle Personal Information in our own right and also for and on behalf of our customers and users.
- Our Privacy Policy does not apply to information we collect about businesses or companies, however it does apply to information we collect about the people in those businesses or companies that we deal with.
- The Privacy Policy applies to all forms of Personal Information, whether collected or stored electronically or in hardcopy form.
- If, at any time, an individual provides Personal Information or other information about someone other than himself or herself, the individual warrants that they have that person's consent to provide such information for the purpose specified.
- If you are under the age of 18 years old you must not use the BlueQ Application without your parent or guardian's consent.

## THE INFORMATION WE COLLECT

- In the course of our business (including our operation of the BlueQ Application), it is necessary for us to collect Personal Information. Without limitation, the type of information we may collect includes:
  - **Personal Details.** We may collect personal details such as an individual's name, date of birth, nationality, family details and other information defined as "Personal Information" in the Privacy Act that allows us to identify who the individual is;
  - **Contact Information.** We may collect information such as an individual's email address, telephone and fax number, third-party usernames, residential, business and postal addresses and other information that allows us to contact an individual;
  - **Qualifications Information.** We may collect information relating to the qualifications, credentials, certificates, certifications, records of training or achievement, records of inspection or examination, records of attendance, assessments, licences, permits, approvals, consents or certificates of compliance that an individual may hold (or previously held) as issued by an educational institution or a regulatory body;
  - **Financial Information.** We may collect financial information related to an individual such as any bank or credit card details used by an individual to transact with us and other information that allows us to transact with the individual and/or provide them with our goods and services;
  - **Sensitive Information.** We may collect sensitive information such as criminal history relating to an individual's criminal history record check or health information specified in the immunisation records of an individual;
  - **Statistical Information.** We may collect information about an individual's online and offline preferences, habits, movements, trends, decisions, associations, memberships, finances, purchases and other information for statistical purposes; and
  - **Information an individual sends us.** We may collect any personal correspondence that an individual sends us, or that is sent to us by others about an individual's activities.
- We may collect other Personal Information about an individual that is not listed above, in accordance with the Privacy Act.
- We may also collect information regarding an individual's computer, network and browser. This may include their IP address.

## HOW INFORMATION IS COLLECTED

- Most information will be collected by us in association with an individual's use of the BlueQ Application, an enquiry about BlueQ or when generally dealing with us. In particular, Personal Information is likely to be collected by us as follows:
  - **Registrations/Subscriptions.** When an individual registers or subscribes for a service, list, account, connection or other process whereby they provide Personal Information to us in order to receive or access our goods or services;

- When an individual registers to use the BlueQ Application;
  - When information about an individual is uploaded to the BlueQ Application or otherwise submitted to us;
  - When an individual contacts us in any way;
  - When an individual accesses our office, we may require them to provide us with details for us to permit them such access;
  - When an individual contacts us through the internet we may collect information using cookies (if relevant – an individual can adjust their browser’s setting to accept or reject cookies) or analytical services;
  - **Pixel Tags.** Pixel tags enable us to send email messages in a format customers can read and they tell us whether mail has been opened; and/or
  - When we purchase goods or services from a third party supplier.
- As there are many circumstances where we may collect information both electronically and physically, we will endeavour to ensure that an individual is always aware of when their Personal Information is being collected.
  - We will generally collect information about an individual directly from that individual. However, there may be occasions when we collect Personal Information from sources other than the individual, such as where we collect information from an organisation that the individual is linked to in the BlueQ Application, advertising agencies, an individual’s own promotions, public records, mailing lists, contractors, staff, recruitment agencies, your employer, an organisation that manages or stores qualifications and credentials and our business partners.

## **WHEN PERSONAL INFORMATION IS USED & DISCLOSED**

- In general, we will use Personal Information we collect for the primary purposes for which it was collected and for related secondary purposes that are within your reasonable expectations.
- Specifically, we collect, use and disclose Personal Information for purposes related to the operation of our business. This may include:
  - Providing goods and services to our customers (including providing you with access to and use of the BlueQ Application);
  - Verifying an individual’s identity or the currency or accuracy of qualifications, credentials or other similar information provided by an individual;
  - Communicating with an individual about:
    - Their relationship with us;
    - Our goods and services;
    - Our own marketing and promotions to customers and prospective customers;

- Competitions, surveys and questionnaires;
- Disclosing to your employer or relevant organisation that you are affiliated with the qualifications, credentials or other similar information you supplied to us and is stored on the BlueQ Application;
- Investigating any complaints about or made by an individual, or if we have reason to suspect that an individual is in breach of any of our terms and conditions or that an individual is or has been otherwise engaged in any unlawful activity; and/or
- As required or permitted by any law (including the Privacy Act).
- There are some circumstances in which we must disclose an individual's Personal Information, including:
  - Where we reasonably believe that an individual may be engaged in fraudulent, deceptive or unlawful activity that a governmental authority should be made aware of;
  - As required by any law (including the Privacy Act); and/or
  - In order to sell our business (in that we may need to transfer Personal Information to a new owner).

#### **Overseas disclosure**

- We may utilise third-party service providers (such as Gmail from Google, Inc., and MailChimp from The Rocket Science Group LLC) to communicate with an individual and to store contact details about an individual. We may disclose your contact details (for example, your email address) or other personal information about you to these third party service providers to enable us to use their platform and services to communicate with you. These service providers are located in the United States of America.

#### **OPTING “IN” OR “OUT”**

- You are under no obligation to provide your Personal Information to us. However, this may prevent us from offering you some or all of our goods or services.
- Generally, when we communicate with you and collect Personal Information from you, you will be provided with the option to either:
  - **Opt In.** Where relevant, an individual will have the right to choose to have Personal Information collected and/or receive information from us; or
  - **Opt Out.** Where relevant, an individual will have the right to choose to exclude himself or herself from some or all collection of Personal Information and/or to receive information from us.
- If you believe that you have received information from us that you did not opt in to receive, or wish to opt out to receive, you should contact us using the details below or use any opt-out mechanism we may make available in our communication to you.

## **CONTACTING INDIVIDUALS**

- From time to time, we may send our customers important notices, such as changes to our terms, conditions and policies. Because this information is important to our customers' interactions with us, you may not opt out of receiving these communications.

## **THE SAFETY & SECURITY OF PERSONAL INFORMATION**

- We will retain Personal Information for a period necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.
- We will take all reasonable steps to protect an individual's Personal Information from unauthorised access, modification or disclosure and misuse, interference and loss. This includes appropriately securing our physical facilities and electronic networks.
- BlueQ uses SSL encryption to store and transfer Personal Information. Despite this, the security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. Each individual that provides information to us via the internet or by post does so at their own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, Personal Information where the security of that information is not within our control.
- If an individual suspects any misuse, interference or loss of, or any unauthorised access to, or unauthorised disclosure of, their Personal Information stored by us, they should let us know immediately.
- If we become aware of any interference, loss, modification or unauthorised access to, or disclosure of, an individual's Personal Information we will inform them at the earliest practical opportunity once we have established what was accessed and how it was accessed.
- We are not responsible for the privacy or security practices of any third party that we may disclose personal information to (including third parties that we are permitted to disclose an individual's Personal Information to in accordance with this Privacy Policy or any applicable laws). The collection and use of an individual's information by such third parties may be subject to separate privacy and security policies.
- We are not liable for any loss, damage or claim arising out of a third party's use of your Personal Information where we were authorised by you or law to provide that third party with your Personal Information.

## **HOW TO ACCESS AND/OR UPDATE INFORMATION**

- Under the Australian Privacy Principles, an individual has the right to request access to the Personal Information we hold about them, and we will generally provide them with such access within 28 days of receiving a written request.
- Users of the BlueQ Application can update their Personal Information from within their BlueQ account or profile.
- If an individual cannot update their own Personal Information, we will correct any errors concerning the Personal Information we hold about them within 7 days of receiving a written notice to correct those errors.

- It is an individual's responsibility to provide us with accurate and up to date Personal Information. We cannot be liable for any Personal Information that is provided to us that is incorrect and not corrected by an individual.
- We may charge an individual a reasonable fee for any costs incurred by us in meeting any of their requests to disclose or correct the Personal Information we hold about them.

## **COMPLAINTS AND DISPUTES**

- If an individual has a complaint about our handling of their Personal Information, they should address their complaint in writing using the details below.
- At all times, privacy complaints will:
  - Be treated seriously;
  - Be dealt with promptly;
  - Be dealt with in a confidential manner; and
  - Will not affect your existing obligations or affect the commercial arrangements between you and BlueQ.
- Our Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following the completion of the investigation.
- In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

## **CONTACTING US**

- Our Privacy Officer oversees the management of this Privacy Policy and compliance with the Australian Privacy Principles and the Privacy Act. This officer may have other duties within our business and also be assisted by internal and external professionals and advisors.
- All correspondence with regards to privacy (including privacy complaints and requests for access or correction of Personal Information) should be addressed to:

The Privacy Officer  
Clasity Pty Ltd trading as BlueQ

Postal address: 10/28 Down Street, Collingwood Victoria 3066

Email address: [privacy@blueq.com.au](mailto:privacy@blueq.com.au)

## **ADDITIONS TO THIS POLICY**

- If we decide to change this Privacy Policy, we will post the changes on our webpage at <http://blueq.com.au/>. Please refer back to this Privacy Policy to review any amendments.
- We may do things in addition to what is stated in this Privacy Policy to comply with the Australian Privacy Principles.