 BOND UNIVERSITY	PRIVACY POLICY
Policy Owner	Company Secretary and General Counsel
Contact Officer	Company Secretary and General Counsel
Endorsement Authority	Vice Chancellor
Date of Next Review	September 2026

1. PURPOSE AND OBJECTIVES

Bond University is committed to protecting the Personal Information it holds. Bond University will collect, manage, use, and disclose Personal Information in accordance with this Policy, the *Privacy Act 1988* (Cth) ('Privacy Act') including the Australian Privacy Principles ('APPs') and any other relevant legislation.

2. AUDIENCE AND APPLICATION

This Policy is intended to apply to all Bond University Staff and Students.

3. ROLES AND RESPONSIBILITIES

Role	Responsibility
<ul style="list-style-type: none"> ○ University Registrar ○ Director, Student Business Services ○ Director, Student Success & Wellbeing ○ Director of Campus Life ○ Vice President Operations; ○ Director, Human Resources ○ Executive Dean ○ Members of formalised incidence response teams 	Clauses 4.2 and 4.3 May collect, use and disclose Personal Information for specific purposes listed in this Policy.
Privacy Officer (privacy@bond.edu.au)	Clause 4.6 Investigates reported incidences of a breach of privacy.

4. POLICY STATEMENT

4.1. Legislation

The Privacy Act establishes a comprehensive national privacy scheme for private sector organisations by setting minimum standards for the handling of [Personal Information](#) by organisations.

The Privacy Act outlines core principles (the APPs) that are the base line privacy standards Bond University will comply with in relation to the Personal Information it holds.

Information held by Bond University in relation to acts done or practices engaged in by Bond University, which are directly related to:

- a current or former employment relationship between Bond University and the individual; or
- an employee [Record](#) held by Bond University and relating to an individual (such as information about leave entitlements, training, etc),

are exempt from the Privacy Act, including the APP's.

Bond University will also comply with foreign privacy regulations where it is required to because of its activities.

4.2. Collection

Bond University only collects Personal Information that is reasonably necessary for its functions and activities. (Refer to the [Privacy Information Schedule](#)). Personal Information will only be collected in a manner that is fair, lawful, and not unreasonably intrusive.

Some of the information that Bond University collects, may include '[Sensitive Information](#)' regarding an individual. Information such as criminal records, political opinions and affirmations, race or ethnic origins, sexual preferences and orientations, health information or memberships with a professional association or trade union would all be considered as Sensitive Information.

If the Personal Information collected by Bond University is incomplete and/or inaccurate, Bond University may be unable to provide an individual with the services they are seeking.

a) Purpose of Collection

The Personal (including Sensitive) Information that Bond University collects and holds about an individual, will depend on their interaction with Bond University. Generally, Bond University will collect and hold an individual's Personal (and Sensitive) Information for the purpose of:

- assessing an individual, or someone else's, application to study at Bond University;
- assessing an individual for a contracted or employed position at Bond University;
- providing services to an individual or someone else they know; Bond University
- providing an individual with information about other services that Bond University offers that may be of interest to them;
- facilitating Bond University's internal business operations, including the fulfilment of any legal requirements;
- analysing Bond University's services and customer needs with a view to developing new and/or improved services;
- contacting an individual, in the case of an emergency involving someone else they know;
- contacting an individual in relation to employment opportunities for Bond University undergraduates;
- contacting an individual to provide a testimonial for Bond University;
- contacting an individual in relation to Alumni activities;
- managing a contractor or non-employed staff relationship, i.e., paying for services, and managing performance; and
- statistical and marketing purposes (relevant for non-Sensitive Information only).

In the case of Visa details, Bond University is required to collect this information pursuant to Australian Immigration Laws.

b) How information is collected

Personal Information will generally be collected by Bond University directly from the individual through the use of Bond University's standard forms, such as Bond University Application for Postgraduate Admission form or via their use of Bond University's website.

There may, however, be some instances where Personal Information about an individual will be collected indirectly because it is unreasonable or impractical to collect Personal Information directly from the individual. For example, Bond University may collect Personal Information from another university or agent for the purposes of administering an individual's enrolment, or from a referee when assessing an application for employment.

Bond University uses Google Analytics to gather statistics about how its website is accessed. Google Analytics uses cookies to gather information for the purpose of providing statistical reporting and remarketing. Most browsers can be set to accept or reject cookies. An individual can choose to adjust their browser to reject cookies or to notify when they are being used. Sometimes, rejecting cookies results in a loss of some website functionality.

c) Notification

When collecting Personal Information, Bond University will take reasonable steps to inform individuals:

- that Bond University is collecting Personal Information about them;
- of the purposes for which the Personal Information is being collected;
- of the organisations to which Personal Information is usually disclosed;
- of what happens if Personal Information is not provided;
- whether the Personal Information is likely to be disclosed to overseas recipients and if so, the countries in which such recipients are likely to be located, if it is practicable to do so; and
- of how to access or seek correction of Personal Information.

We will usually notify the individual about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

4.3. Use and Disclosure

Bond University will generally only use or disclose Personal Information for the primary purposes for which it was collected or a related (or directly related for Sensitive Information) [Secondary Purpose](#). Bond University may disclose Personal Information about an individual to:

- service providers, who assist Bond University in operating its business, however, these service providers are required to comply with Bond University's privacy policy in how they handle Personal Information;
- a purchaser of the assets and operations of Bond University's business, providing those assets and operations are purchased as a going concern;
- its related entities;

- other universities for the purposes of administering the individual's enrolment or transfer to another university, including for overseas exchange programs across Asia, Europe, Latin America and North America;
- in the case of untrue or misleading information, the Universities Australia (UA) or any UA member institution;
- the nominated next of kin or emergency contact where, in the opinion of one of the following officers, an emergency situation has taken place, or the disclosure of specific information is required to prevent or lessen a serious and imminent threat to the health, safety or wellbeing of the student or other persons:
 - University Registrar
 - Director, Student Business Services
 - Director, Student Success & Wellbeing
 - Director of Campus Life
 - Vice President Operations
 - Director of Human Resources
 - Executive Dean
 - Members of formalised incidence response teams.
- a specified agent and/or next of kin for the purpose of processing an application made by an individual;
- a specified third party where there is written authority and consent from the student concerned to provide specific information;
- law enforcement agencies who have submitted a written request for disclosure of Personal Information; and
- Federal, State or Local Government Departments or Agencies who require the information for official purposes.

From time to time, Agencies are lawfully entitled to share Personal Information provided by Bond University to them among themselves. Where Bond University becomes aware that Personal Information has been shared with another Agency it will advise anyone affected, once it becomes aware and subject to any legal requirements.

Bond University staff may require access to Personal Information held by Bond University in order to perform university related tasks, including in relation to student matters and for Alumni purposes. Personal Information will only be disclosed as required.

Some Personal Information may be transferred overseas. For example, Personal Information may be shared with overseas universities for students applying for exchange or internships. Bond University also uses cookies to gather information for the purpose of providing statistical reporting and remarketing. The information generated by the cookie about an individual's use of the website will be transmitted to and stored by Google on servers located outside of Australia. No personally identifying information is recorded or provided to Google.

4.4. Security

Bond University stores Personal Information in different ways, including in paper and in electronic form. Bond University will take all reasonable measures to ensure Personal Information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

Bond University will ensure that Personal Information is kept for no longer than is necessary for the purposes for which it may lawfully be used. Records will be disposed of securely and in accordance with any requirements for the retention and disposal of Personal Information.

4.5. Access and Correction

Bond University will provide an individual with access to Personal Information about them upon receipt of a written request sent to the contact details provided below. Bond University will endeavour to acknowledge such requests within 14 days of its receipt and provide requested information within 30 days. A fee may be charged to cover processing of such requests.

Bond University may decline a request for access to Personal Information where, among other things:

- providing access would pose a serious threat to the life or health of an individual;
- providing access would have an unreasonable impact upon the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the request is not a genuine request for Personal Information and is made for purposes other than a permitted reason under the Privacy Act;
- the information relates to existing or anticipated legal proceedings between Bond University and the individual, and the information would not be accessible by the process of discovery in those proceedings;
- providing access would reveal evaluative information about a commercially sensitive decision making process;

- providing access would reveal the intentions of Bond University in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- restricting or denying access is required or authorised by or under law;
- Bond University has reason to suspect that unlawful activity or misconduct relating to its functions or activities has been, is being or may be engaged in, and giving access would be likely to prejudice the taking of appropriate action in the matter;
- providing access would be likely to prejudice an investigation of possible unlawful activity; or
- providing access would be likely to prejudice the activities of enforcement bodies.

If an individual believes inaccurate, incomplete or outdated information is being held about them, they should notify Bond University immediately using the contact details below. Bond University will take reasonable steps to correct the information so that it is accurate, complete, up to date, relevant and not misleading. If Bond University disagrees with the individual about whether their Personal Information is inaccurate, incomplete, or out of date, and the individual asks Bond University to associate with their Personal Information a statement claiming that their Personal Information is inaccurate, incomplete or out of date, Bond University will take reasonable steps to do so.

4.6. Complaints about Breaches of Privacy

If an individual wishes to make a complaint about a breach of the Privacy Act, APPs or this Privacy Policy, in the first instance, they should do so directly to Bond University in writing at the contact details listed below.

Bond University will endeavour to acknowledge such requests within 14 days of its receipt and propose a timeline for a response.

If Bond University is unable to resolve the complaint, the individual may contact the Office of the Australian information Commissioner (OAIC).

5. CONTACT DETAILS

Any queries, concerns or complaints about Bond University's handling of Personal Information should be directed to Bond University's privacy officer at:

Address: University Drive, Robina, QLD, 4226
 Postal address: Bond University, Gold Coast, QLD, 4229
 Email: privacy@bond.edu.au
 Tel: [+61 7 5595 3549](tel:+61755953549)

6. DEFINITIONS, TERMS, ACRONYMS

Personal Information	Personal Information is defined in the Privacy Act to mean information or an opinion, whether forming part of a database or not, whether true or not and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable (Personal Information).
Record	A Record is defined in the Privacy Act to include: <ul style="list-style-type: none"> ▪ a document; ▪ an electronic or other device; Bond University does not include, among other things, a generally available publication.
Secondary Purpose	A directly related secondary purpose is one which is closely associated with the primary purpose, even if it is not strictly necessary to achieve that primary purpose.
Sensitive Information	Sensitive Information is defined in the Privacy Act to mean information or an opinion about an individual's: <ul style="list-style-type: none"> ▪ racial or ethnic origin; ▪ political opinions; ▪ membership of a political association; ▪ religious beliefs or affiliations; ▪ philosophical beliefs; ▪ membership of a professional or trade association; ▪ membership of a trade union; ▪ sexual preferences or practices; or ▪ criminal record.

7. AFFILIATED PROCEDURES AND SCHEDULES

Bond University Privacy Compliance Manual
[Privacy Information Schedule](#)


8. RELATED DOCUMENTS

[Australian Privacy Principles Guidelines](#)
[Bond University Data Breach Response Plan](#)
[Procedure for Disclosure of Personal Information to Law Enforcement and other External Agencies](#)
[Information Security Policy](#)
[The Privacy Act 1988 \(Commonwealth\)](#)
[Australian Privacy Principles](#)

9. MODIFICATION HISTORY

Date	Sections	Source	Details
September 2023	All	Company Secretary	V4 – major rewrite
16 June 2021			V 3.1 Reviewed
18 September 2020			V 3 Amended
July 2014			V2
2 March 2005			Date First Approved

APPROVAL AUTHORITY: Vice Chancellor

 BOND UNIVERSITY	PRIVACY INFORMATION SCHEDULE
Schedule Owner:	Company Secretary and General Counsel
Contact Officer:	Company Secretary and General Counsel
Approval Authority:	Company Secretary and General Counsel
Date of Next Review:	August 2024

1. THE SCHEDULE

Kinds of Information Collected

Bond University may collect and hold Personal Information about an individual, including:

- **For prospective, current and alumni students of Bond University:** their name, date of birth, gender, address, phone number, email address, next of kin details, bank account details, academic history, criminal history, employment record, FEE-HELP status, nationality, visa details, passport details, travel details, preferred course of study, photograph, accommodation preferences, dietary requirements, physical attributes, religious beliefs and/or other information relevant to providing them with the services either they, or someone else they know is, seeking.
- **For patients of the Bond University health service and Allied Health Clinics** (psychology, physiotherapy, nutrition and dietetics, occupational therapy): their name, date of birth, gender, address, phone number, email address, next of kin details, payment details, Medicare / DVA / Health fund cover details, medical history.
- **For clients of Bond University's Law Clinics:** their name, date of birth, gender, address, phone number, email address, legal history and legal information.
- **For prospective employees, contractors and other non-employed staff (e.g., Adjunct Professors):** their name, date of birth, gender, address, phone number, email address, next of kin details, bank account details, criminal history, employment record, referees.

When individuals access Bond University's website, Bond University may collect additional Personal Information about them including the following:

- the IP address of the computer they are using or an IP that is dynamically allocated by their internet service provider;
- the date and time of their visit;
- the pages accessed and documents downloaded;
- the file size of the pages downloaded;
- the type of browser used and screen resolution;
- the referring page (i.e. last page visited before entering the Bond University website).

2. AFFILIATED POLICIES, PROCEDURES AND GUIDELINES

[Privacy Policy](#)

3. MODIFICATION HISTORY

Date	Sections	Source	Details
September 2023			Separated from Policy
2 March 2005			Date first approved within Policy