

GENERAL

Vast Fitness Academy Pty Ltd (“Vast”) is committed to providing you with the best possible student service experience. This following document sets forth the Privacy Policy for the Vast website, www.vastfitnessacademy.edu.au (the “Website”) and/or our student portal (the “Portal”) which may from time to time comprise a third party provided and hosted portal. By using our Website or Portal, you consent to the collection, use and disclosure of your personal information as described in this Privacy Policy. This Privacy Policy is also incorporated into and subject to the terms of the Vast Student Handbook and our Terms and Conditions which may be updated from time to time.

Vast welcomes your comments regarding this Privacy Policy. If you have any questions about this Privacy Policy and would like further information, please contact us via email at: admin@vastfitnessacademy.edu.au

COLLECTION OF YOUR PERSONAL INFORMATION

There are many aspects of the Website that can be viewed without providing personal information, however to make an enquiry, receive further information (by way of email, SMS or telephone) or for access to additional Vast student features on the Website or Portal you are required to submit personally identifiable information.

We are also required to collect personal information regarding students pursuant to the *Data Provision Requirements 2012* and to disclose that personal information to the National Centre for Vocational Education Research (“NCVER”).

TYPES OF INFORMATION WE COLLECT

Personal Information: Personal information is information to specifically identify an individual, such as a user's name, address, and e-mail address. Personal information also includes demographic information, such as date of birth, gender, geographic area, preferences and training activity and inputs when such information is linked to other personal information that identifies the individual.

Usage Information: Personal information does not include usage information. Usage information is data we collect about our services and student usage of those services, from which individual student identities have been removed. In other words, information about how you use a service might be collected and combined with information about how others use the same service, but no personal information will be included in the resulting data. Usage information helps us understand trends and student needs so we can better refine and introduce features to improve user experience. We might share usage information about our users with third parties for various purposes, such as helping us better understand and improve our services, and for advertising and marketing purposes.

SHARING OF YOUR PERSONAL INFORMATION

We may occasionally engage other companies to provide services on our behalf, including but not limited to handling payments and student support enquiries. Those companies will be permitted to obtain only the personal information they need to deliver the service. Vast takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

We may also be required to provide your personal information to the following types of organisations and you consent to the provision of your personal information to the following types of entities as we reasonably require from time to time:

- if you are a student of another educational organisation undertaking VET, including school-based apprenticeship or traineeship;
- your employer (if you are enrolled in training paid by your employer);
- Commonwealth and State or Territory government departments and authorised agencies;
- NCVET;
- Organisations engaged (by Vast or other entities of the type listed herein); and
- Researchers.

Personal information disclosed to NCVET may be used or disclosed for the following purposes:

- Issuing a VET Statement of Attainment or VET Qualification, and populating Authenticated VET Transcripts;
- facilitating statistics and research relating to education, including surveys;
- understanding how the VET market operates, for policy, workforce planning and consumer information; and
- administering VET, including program administration, regulation, monitoring and evaluation.

NCVET will collect, hold, use and disclose your personal information in accordance with the *Privacy Act 1988* (Cth), the VET Data Policy and all NCVET policies and protocols (including those published on NCVET's website at www.ncvet.edu.au).

We may also share your personal information with credit reporting agencies, insurers, underwriters, guarantors, agents, finance providers, contractors, assignees, debt collection agencies, mercantile agencies, call centre operators, solicitors, accountants and other third parties associated with the provision of finance and/or collection of outstanding debts. This may also include the provision of your personal information to credit reporting agencies who may provide this to other credit providers as part of their credit reporting services.

USE OF YOUR PERSONAL INFORMATION

For each visitor to reach the Website, we may collect the following non-personally identifiable information, including but not limited to browser type, version and language, operating system, pages viewed while browsing the Website, page access times and referring website address. This collected information is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalized content to you while you are at this Website.

From time to time, we may use student information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future we will use for these new purposes only, data collected from the time of the policy change forward will adhere to our updated practices.

We may use your personal information for the purposes of responding to any enquiry that you have made through the Website including the incorporation, storage and transmission of such personal information on our systems within Australia and overseas.

We may use your personal information for the purposes of assisting you in your studies should you become or request to be a student of Vast. This may include but is not limited to the assessment of your course submissions (by Vast and/or third part providers), training patterns and behaviours, considerations relating to your application to become a student, any potential

breaches by you of the Student Handbook and any Terms and Conditions, and your suitability for continued enrolment with Vast.

EMAIL AND NEWSLETTERS

When you enrol and/or create an account through the Website and/or Portal, we ask for personal information that may be used to send you the newsletter(s) and other information that you have opted in to receive (including but not limited to promotional material). You may choose not to receive promotional emails or electronic newsletters from us by: (A) following the “unsubscribe” instructions in the specific email from which you wish to opt-out; (B) visiting the “Your Account” or equivalent section of the Website and following the appropriate instructions or (C) contacting admin@vastfitnessacademy.edu.au and specifying the particular email(s) from which you wish to be removed.

PUBLIC FORUMS

We may offer chat rooms, message boards, bulletin boards, blogs, review forums or similar public forums where you and other users of the Website or Portal can communicate and share your opinions with respect to Vast’s services, student or assessment material or any course materials. The protections described in this Privacy Policy do not apply when you provide information (including personal information) in connection with your use of these public forums. We may use personally identifiable and non-personal information about you to identify you with a posting in a public forum. Any information you share in a public forum is public information and may be seen or collected by anyone, including third parties that do not adhere to our Privacy Policy. We are not responsible for events arising from the distribution of any information you choose to publicly post or share through any public forum on the Website or Portal.

CONTESTS, PROMOTIONS, OFFERS, AND SURVEYS

From time to time Vast may request personal information from users via contests, promotions, offers and surveys. Participation in these contests, promotions, offers, and surveys is completely voluntary and you may choose whether to disclose personal information in connection with these activities. Personal Information requested in these activities might include contact information and demographic information. We use this information to notify you if you've won and to award prizes. We also may collect usage information (ie, "what is your satisfaction level with the Vast services you have used?"). We use information we collect in surveys for internal purposes and to refine or identify new features to best support our users. We might also provide third parties with this information, and might combine it with some or all of your registration information. Third parties might use the information we provide them to contact you regarding products or services of interest to you. These disclosures are discussed in greater detail below in the "Disclosure of Personal Information" section. When we provide information collected during a contest, promotion, offer, or survey on the Website to third parties, we always disclose this to you at the time of collection.

You may receive an NCVET student survey which may be administered by an NCVET employee, agent or third party contractor. You may opt out of the survey at the time of being contacted.

DISCLOSURE OF PERSONAL INFORMATION

Vast will not sell or rent personal information with third parties without your prior consent except in the limited circumstances described in this Privacy Policy.

Vast's own business purposes: We use and disclose information about you for our own internal statistical, design, or operational purposes, such as to estimate market size, measure traffic patterns, and understand demographic, user interest, usage, other trends among our users including assessment of student submissions and outcomes. We might outsource these tasks and disclose personal information about you to third parties, provided the use and disclosure of

your personal information by these third parties is restricted to performance of such tasks. We might also share personal information with third-party vendors who assist us in performing internal functions necessary to operate our business. We require our third-party vendors to keep such information confidential and to only use the information for the purpose it was provided.

Protection of Vast and others: We disclose personal information when we believe it is appropriate to comply with the law; to enforce or apply this privacy policy or our other policies or agreements; to protect our or our users' rights, property or safety; or to protect our users from fraudulent, abusive, or unlawful use of the Website or Portal; or if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of personal information without delay.

Business transfers: Information about our users, including personal information, might be disclosed as part of any merger, acquisition, debt financing, sale of company assets, as well as in the event of an insolvency, bankruptcy or receivership in which personally identifiable information could be transferred to third parties as one of the business assets of the company.

INTERNATIONAL USERS

We collect, process, and maintain your information in Australia under the Privacy Act 1988. If you are using the Website or Portal from outside Australia, by providing your information to us you are consenting to the transfer of your information to Australia for processing and maintaining in a manner consistent with this Privacy Policy.

SECURITY

We use reasonable security measures to store and maintain personally identifying information to protect it from loss, misuse, alteration or destruction by unauthorized parties while it is under our control. We provide no guarantee that such personally identifiable information will not be the target of malicious or unauthorised attempts by third parties to obtain such information and in the event of such a third-party obtaining information through unauthorised means, we will be unable to control the use of such information.

THIRD PARTY LINKS

Vast might have links to other websites. We do not control, and therefore cannot be responsible for, the collection, use, or disclosure of your information by any such third-party websites. Please carefully review the privacy policy of any third-party website as they may differ from ours.

THIRD PARTY SOURCES

Vast might also obtain information about you from third parties (such as demographic marketing information, address verification, or third party mailing lists) and collate such information with your personal information. Should we ever obtain this information, we will treat it all as personal information under this Privacy Policy.

CHANGES TO THIS PRIVACY POLICY

Vast reserves the right to make amendments to this Privacy Policy at any time. If you have objections to the Privacy Policy, you should not access or use the Website.

ACCESSING YOUR PERSONAL INFORMATION

You have a right to access your personal information, subject to exceptions allowed by law. If you would like to do so, please let us know. You may be required to put your request in writing for security reasons. Vast reserves the right to charge a fee for searching for, and providing access to, your information on a per request basis.