



## **Privacy Policy**

### **1 Introduction**

1.1 This Privacy Policy ("**the Policy**") is for the following website <https://www.scaconnect.com/> ("**the Website**") and served by Janaye Pty Ltd trading as SCA Connect, an Australian immigration service provider.

1.2 The Policy governs of privacy of users who choose to use the Website.

### **2 Website**

2.1 The Website and its owners may collect personal information through the Website, including when users subscribe to Newsletters, contact us about a service, event, program, competition, activity or set up an account.

2.2 The Website and its owners ensure necessary steps are taken to protect privacy of its users and compliance with the *Privacy Act 1988*, the *Australian Privacy Principles*, and to the extent legally required, the *European Union General Data Protection Regulation ("GDPR")\** and as a contracted service provider to the Australian Commonwealth Government.

### **3 Links to other websites**

3.1 The Website may contain links or references to other websites or organisations. The Website and its owners are not responsible for the privacy practices or content of the linked web sites and other pages hosted by the Website or its owners on behalf of external organizations, entities or individuals.

3.2 Users are encouraged to read privacy and security policies of the external organizations, entities or individuals before they supply personal information to them. The Website and its owners should not be held liable for any damages or implications caused by users visiting any external links mentioned.

### **4 Cookies**

4.1 A cookie is a piece of data sent from a website and stored in a user's web browser. Cookies track, save and store information about users' interactions and usage of a website.

4.2 The Website may collect cookies to understand how online services are used. Users are advised to change their browsers' preferences to reject all cookies before accessing the Website.

4.3 The Website may use Cookies for a number of reasons, including utilising cookies to remember your log-in status and viewing preferences from a previous use of an online service. The Website may also transfer cookies on computers and devices that access the Website for record-keeping purposes.

4.4 The Website, its owners and Google Analytics may also collect the following information:

(a) users' computer or device's IP address (collected and stored in an anonymised format);

(b) device screen size;

(c) device type, operating system and browser information;

(d) geographic location (country only);

(e) referring domain and out link if applicable;

(f) search terms and pages visited (clickstream data); and

(g) date and time when website pages were accessed.

Users can read Google's privacy policy here <http://www.google.com/privacy.html>

4.5 Other cookies may be stored to users' devices by other third parties when the Website uses referral programs, external vendors or advertisements. Such cookies are used for business development, conversion and referral tracking and would normally expire after 30 days.

## **5 Social Media networks or platforms**

5.1 The Website and its owners may use social media networks or platforms to communicate with users. The Website and its owners may collect users' personal information for the purpose of communicating with them on social media networks or platforms.

5.2 Communications through such social media networks or platforms are subject to terms and conditions, and privacy and security policies held with relevant social media network or platform. Personal information disclosed by users on these social media networks or platforms may be stored overseas. As such, users wishing to discuss sensitive personal details are strongly encouraged to contact SCA Connect directly through the Website, telephone or email.

## **GDPR Compliance Policy**

### **1 European Union Residents**

This European Union General Data Protection Regulation Compliance Policy (“**the GDPR Compliance Policy**”) applies to a user who is a resident of the European Union for the purposes of the GDPR (hereafter “**You**”).

### **2 Consent for processing Personal Data**

SCA Connect is a data controller and processor for the purposes of the GDPR and by Your consenting to the GDPR Compliance Policy, You consent to SCA Connect processing Your personal data in accordance with this GDPR Compliance Policy.

### **3 Consent for use of automated processes**

In providing services to You, SCA Connect may make use of a number of automated processes using Your personal data and Your activity on our website, as tracked in SCA Connect’s website, work stations or other devices, in order to provide more tailored and relevant services to You.

### **4 Right to Access**

You are entitled to ask whether SCA Connect is processing Your personal data and request access.

### **5 Right to rectification**

If requested by You, SCA Connect will rectify any inaccurate personal data held by SCA Connect without undue delay. If Your personal data is incomplete, SCA Connect will complete or provide a supplementary statement to be held with Your personal data. SCA Connect will communicate to You any rectification or completion of Your personal data.

### **6 Right to erasure**

You have the right to request that SCA Connect to delete Your personal data, subject to any legal or regulatory requirement to retain Your personal data.

### **7 Right to restriction of processing**

You have the right to request that SCA Connect cease or restrict processing Your personal data. SCA Connect will communicate with You and confirm if we are to take such action.

### **8 Right to data portability**

You may request to be provided with Your personal data which You have provided to SCA Connect in a structured, commonly used and machine-readable format and have the right to request that SCA Connect provide the data to another controller.

### **9 Right to object**

You may object to SCA Connect's processing of Your personal data which is processed for the performance of a task carried out in the public interest or where processing is necessary for the purposes of the legitimate interests pursued by SCA Connect or a third party, in accordance with the GDPR. If You object to SCA Connect's processing of Your personal data for direct marketing purposes, SCA Connect will stop sending You direct marketing.

### **10 Automated individual decision-making (i.e. profiling)**

You are entitled to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects, or has similar significant effects, concerning You, unless it is necessary to provide You with a service You have requested or You otherwise consent.

If You make a request regarding one of the matters referred to in paragraphs 4-9, We will provide the information or take the action requested as soon as possible and within one month of such request, unless it becomes necessary to extend this date. In that case, SCA Connect may take a further two months to respond, taking into account the complexity and number of requests.

### **11 Complaint process**

If You are concerned with SCA Connect's collection or processing of Your personal data, You may complain to a Supervisory Authority

## **Privacy Statement**

**SCA Connect** is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aoic.gov.au](http://www.aoic.gov.au)

### **What is Personal Information and why do we collect it?**

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website [www.scaconnect.com](http://www.scaconnect.com), from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

### **Sensitive Information**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

### **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you.

However, in some circumstances, we may be provided with information by third parties. In such a case, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

### **Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

### **Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

### **Access to your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

**SCA Connect** will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

### **Maintaining the Quality of your Personal Information**

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.



**Policy Updates**



This Policy may change from time to time and is available on our website.

### **Privacy Policy Complaints and Enquiries**

If you have any queries or complaints about our Privacy Policy please contact us at:

Ground Floor, 470 St Kilda Rd, Melbourne VIC 3004