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1. Introduction

Steel Mains (we, us, our) operates or utilises an online learning management system (**LMS**) platform (**Platform**) providing online learning services to customers, learners, administrators, and other users (you, your).

Steel Mains values the privacy of our customers and is committed to protecting personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

This Privacy Policy (Policy) describes how we collect, hold, use and disclose student personal information in connection with our training services, the Platform and related services, and how we maintain the quality and security of the personal information. By using the Platform or providing personal information to us, you acknowledge that your information will be handled in accordance with this Privacy Policy.

2. What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

“Overseas recipient” is a person or entity that is not in Australia and is not us or the individual concerned.

3. Personal Information We Collect

Steel Mains collects personal information, by lawful and fair means and in a non-intrusive way. Steel Mains collects personal information to conduct business, provide training and commercial purposes. Steel Mains may collect personal information such as

3.1 Student details such as:

- Full Name
- Email address and other contact details
- Employer details and role
- Training enrolment, progress and completion records
- Assessment results and certification status
- System usage data (login activity, password, progress)

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3.2 Individuals/company details - related to, or associated with, students who may be organising training on behalf the student- including name and contact details.

Steel Mains may record virtual sessions for students to be able to review by students or for assessment purposes only.

Use of images of students are only used with consent of each student in the image.

4. How we collect and hold Personal information

Where it is reasonable and practicable to do so, Steel Mains collect personal information directly from the individual/students, including when you:

- visit or use our website
- complete online forms, registration forms or enrolment forms
- participate in surveys or feedback activities
- register for, attend or participate in a training course, assessment, workshop or event
- communicate with us by email, telephone in person or other channels

Collection from third parties

In some circumstances such as employer-sponsored training, it is impracticable to collect all enrolment details directly from each student because enrolments are coordinated by the employer as the sponsoring organisation. Hence, Steel Mains may collect personal information from third parties, rather than directly from the student. Third parties Steel Mains may collect personal information from include:

- an employer, where training or assessment is organised, sponsored or required by the employer:
- a company or organisation arranging training on behalf of an individual or group of students
- service providers and third parties such as payment processors
- other parties authorised to provide information to us in connection with training or events

For example, an employer may provide us with student names, contact details, job roles or attendance information to enable us to organise and deliver training on their behalf.

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5. Purpose of Collection

Steel Mains use personal information to deliver our core functions or activities, and to comply with our obligations with respect to the provision of training. We use your information for the primary purpose for which it was collected and related secondary purposes that individuals would reasonably expect. Such primary and secondary purpose may include but not limited to

- Content delivery and learning/training activities
- Administer training and certification
- Meet contractual and compliance requirements
- Communicate training updates
- Improve training services
- Provide you with information or services that you request from us
- Deliver to you a more personalised experience and service offering
- Internal administrative purposes, discretionary reporting and disclosure to other external bodies
- Marketing and research purposes
- Satisfaction surveys, and complaint and incident reporting.

6. Notification of the collection of personal information

When Steel Mains collect personal information, we take reasonable steps to notify individuals, or otherwise ensure they are aware, of the matters required under Australian Privacy Principle 5, at or before the time of collection, or as soon as practicable afterwards.

- Online Registrations: A notification of the collection of personal information (**Annexure A**) is provided at the time Steel Mains collect personal information before the personal information is submitted. The notification acknowledges that where personal information has been provided by an employer or another organisation, it is confirmed that the employer or organisation has informed the individual student that personal information has been disclosed to us for this purpose.
- Additionally, if personal information is obtained from a third party such as an employer or organisation, we make reasonable efforts to ensure that individuals are informed about this at the time they enrol in our LMS.

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7. Disclosure of personal information to third parties

Steel Mains may disclose student information to third parties in accordance with this Policy, in circumstances where it would reasonably be expected to disclose student information and where appropriate for the purposes set out above, including but not limited to:

- Employer or company who has organised training on behalf of the students
- Financial institutes for payment processing
- Our contracted service providers, including overseas and local agents, information technology service providers (such as Online Learning Management System (LMS and Microsoft), IT providers, venues and event organisers, and externally hosted applications and software subscriptions
- Marketing providers and Professional services advisors
- As required or authorised by law
- Otherwise with your consent

We do not sell personal information.

Transfer of personal information overseas

Some of the third-party service providers to whom Steel Mains discloses personal information may be based overseas or have servers located outside Australia, including in the United States and the United Kingdom.

Steel Mains uses a third-party Learning Management System (LMS) to deliver and administer training, assessments, certifications and related services. This LMS is hosted overseas through cloud infrastructure located in the United States and the United Kingdom. As a result, personal information we collect may be disclosed to, stored and processed by an overseas service provider.

When you submit a registration form, confirm enrolment, or access our LMS (including via our website or online forms), you acknowledge and agree that your personal information will be disclosed to our LMS provider for the purpose of delivering and administering training and related services.

Steel Mains takes reasonable steps to ensure that overseas service providers handle personal information in a manner consistent with the Australian Privacy Principles, including through contractual arrangements, security controls and governance measures. However, you acknowledge that privacy laws in overseas jurisdictions, including the United States and the United Kingdom, may differ from those in Australia.

Unless an exception under Australian Privacy Principle 8 applies, Steel Mains remains accountable for the handling of personal information disclosed to overseas recipients in accordance with the Privacy Act 1988 (Cth).

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Where a student enrolls in the LMS, the student will also have access to the LMS provider's privacy collection notices and use terms, which apply in addition to this Privacy Policy.

We take reasonable steps to ensure overseas recipients handle your personal information in accordance with the APPs (for example, by using contractual obligations and technical/organisational measures). In accordance with APP 8, we remain accountable for personal information disclosed overseas unless an exception applies.

If you do not wish for your personal information to be disclosed to an overseas LMS provider, this may affect our ability to provide training, assessment or certification services to you.

8. Data Security

Steel Mains takes reasonable steps to protect the personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Personal information may be held in hard-copy records, as electronic data, within Steel Mains' systems, Microsoft cloud services, such as Microsoft SharePoint and related Microsoft 365 applications, an third-party systems, including cloud-based platforms, Learning Management Systems (LMS), or other networked or electronic storage environments.

Steel Mains applies a combination of technical and organisational safeguards, including:

- technical safeguards, such as access controls, user authentication and anti-virus software;
- restricted access, so that personal information is accessible only to personnel who require it to perform their duties;
- organisational safeguards, including confidentiality obligations with employees accessing personal information, internal policies and staff training;

Where personal information is no longer required for any purpose permitted under the Australian Privacy Principles, Steel Mains will take reasonable steps to destroy or de-identify the information, unless retention is required by law.

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9. Access & Correction

Steel Mains takes reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up-to-date and complete. We rely on individuals to provide accurate information at the time of collection and to notify us promptly of any changes to their personal details.

In some instances, you may be able to access and update your personal information directly through our Learning Management System (LMS).

Otherwise, you may request access to, or correction of, your personal information by contacting us at training@steelmains.com. We will take reasonable steps to:

- provide access to personal information we hold about you within a reasonable period, unless an exception under the Privacy Act applies; and
- correct personal information where we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading

10. Complaints

For complaints about how Steel Mains handles, processes or manages your personal information, please contact us (training@steelmains.com). Steel Mains aims to resolve privacy complaints in a timely, fair and transparent way. If you are not satisfied with Steel Mains response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

11. How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us by:

Email: training@steelmains.com

Contact number: Phone: (07) 3435 5500

12. Changes to the Privacy Statement

The Steel Mains Privacy Policy is subject to updates at any time, particularly in response to changes in company practices or amendments to relevant legislation. Advance notice may not always be provided; therefore, it is advisable to review the policy regularly for any modifications.

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Annexure 1- Privacy collection notice (APP 5)

Steel Mains collect personal information to register students for training, administer assessments, issue certifications, and communicate with you about these services. If we do not collect this information, we may be unable to create accounts, provide training or certification services to you and our students or comply with applicable record-keeping, financial, and reporting laws.

Personal information may be provided to us directly by student, or by an employer or another organisation that is arranging training on a student's behalf. Where personal information has been provided by an employer or another organisation, it is acknowledged and confirmed that the employer or organisation has informed the individual student that personal information has been disclosed to us for this purpose.

Student personal information may be disclosed to third parties, including an employer (where training is arranged on the student behalf) and our Learning Management System (LSM) provider. Steel Mains uses a third-party Learning Management System (LMS) to deliver and administer training, assessments, certifications and related services. This LMS is hosted overseas through cloud infrastructure located in the United States and the United Kingdom. As a result, personal information we collect may be disclosed to, stored and processed by an overseas service provider.

When you submit a registration form or confirm enrolment including through our website, online forms or accessing our LMS, you acknowledge and agree that personal information will be disclosed to our LMS provider for the purpose of delivering and administering training and related services.

Steel Mains Privacy Policy explains how we collect, use, store and disclose personal information, how you can access or correct your information, and how to make a privacy complaint.

Privacy Policy Acknowledgement

☐ I acknowledge that I have read and understood this notice and Steel Mains Privacy Policy which is available at: [Insert link to Privacy Policy]