

GDPR Privacy Policy - Myprofile Pty Ltd

The European Union's (EU) General Data Protection Regulation (GDPR) came into force on 25 May 2018.

GDPR protects your rights to privacy and how your data is managed by Myprofile Pty Ltd and our Product partners.

Myprofile gathers personal data in accordance with the principles set out in the GDPR. We do not gather sensitive information, such as religious, medical, biometric or financial data.

GDPR sets out your rights and you have the right to:

- be forgotten
- access your data
- request your data be erased
- request for the processing of their data to be restricted;
- restrict how your data portability

GDPR provides six lawful methods that can be used as the lawful basis for processing personal data. We have established our lawful basis for all of our data processing operations.

Our most important data processing operation is that of User data, for which, we identified that legitimate interests, GDPR Article 6(1)(f), is our lawful basis. We conducted and documented a thorough necessity and balancing test to ensure that the legitimate interests are not outweighed by the fundamental rights of the data subject (the User). We concluded that the case was overwhelming due to the legitimate interests of the User (the data subject), the school, and MyCareerMatch are strongly aligned.

This privacy policy forms part of our terms and conditions of use and is a statement as to how we will process your Personal Data when you access and use this Site (as defined below) and/or when you use it to access and use our Products. Additional terms relating to the processing of your Personal Data may apply to your use of some of our online Products, and these will be referred to in the relevant Products.

[Click to view GDPR as it relates to schools, colleges and higher educators](#)

1. DEFINITIONS

1.1 The following words and expressions shall have the following meanings unless the context otherwise requires:

“Data Protection Officer”	the person referred to in paragraph 4 below. Appointed by us to deal with issues regarding our compliance with the GDPR.
“Cookie”	a small amount of data sent from the server, which is then stored on your computer's hard disc drive.
“GDPR”	General Data Protection Regulation
“Generic Data”	anonymous information which does not specifically identify you.
“Products”	our software products which a user may use on the Site or on our Partners site.

“Sensitive Personal Data Protocol”	our protocol for the processing of your Sensitive Personal Data.
“Site or Sites”	all websites owned by Myprofile Pty Ltd
“We”, “Us”, “Our”	Myprofile Pty Ltd, a company registered in Sydney NSW Australia with the company registration number ACN 097530428 and whose registered office is Quantum Partners Suite 1, Level 1, 97 Grafton Street BONDI JUNCTION NSW 2022 AUSTRALIA
“You” and “Your”	the user or the person for whom the user is inputting personal data.

1.2 The following words and expressions have the same meanings attributed to them as in the GDPR unless the context otherwise requires:

- “Data Controller”
- “Data Processor”
- “Personal Data”
- “Process” “Processing”
- “Sensitive Personal Data”

The full text of these definitions can be obtained from the Information Commissioner’s Office (ICO) by visiting www.ico.org.uk

2. INTRODUCTION AND SCOPE OF THIS PRIVACY POLICY

2.1 We are the Data Controller and Data Processor in respect of Personal Data. This includes any Personal Data relating to you that we Process from time to time. We take the security and privacy of your Personal Data seriously and we are committed to safeguarding your privacy online.

2.2 When you access the Site to use our Products, our primary reason for collecting your Personal Data is to enable us to process your request and to complete an online assessment “MyCareerMatch or MyCareerCourse”.

2.3 When you access the Site to use any of our Products online, our primary reason for collecting your Personal Data is to provide an effective service. We do this by matching your answers to our questionnaire to suitable careers and linking this to our Partner website.

2.4 This privacy policy may change from time to time, so please check it periodically.

2.5 Our Site contains links to other websites. Please note that we are not responsible for the privacy practices of such other websites and we advise you to read the privacy statements of each website you visit which collects personal information.

3. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU AND WHERE DO WE GET IT FROM?

3.1 The types of personal data which we may collect from you could include: your name, your contact details (such as your address, postcode, telephone number and email address), school, age, parent email, class year, study options or responses to an online survey.

4. WHAT DO WE DO WITH YOUR PERSONAL DATA?

4.1 We will process your Personal Data so that:

4.1.1 we (or a Data Processor on our behalf) can process your orders for Products from us subject to our terms and conditions of sale;

4.1.2 we can fulfil our obligations to you under any contract for the supply of Products subject to our terms and conditions of sale;

4.1.3 we can create a quotation for Products for you were requested;

4.1.4 we (or a Data Processor on our behalf) can respond to enquiries from you about Products and other requests for information;

4.1.5 we can process and where necessary amend your registration details when you use Products online through the Site;

4.1.6 we can deliver the services forming part of the Products to you when you access those Products online through the Site;

4.1.7 we (or a Data Processor on our behalf) can deal with general queries you raise from time to time through the "Contact Us" link on the Site, by e-mail, by telephone or by post;

4.2 Other purposes for which we will process your Personal Data are:

4.2.1 only if you 'opt in' to receive communications from us can we, or any companies in our group, send you information (by post, email or by telephone) about our products and services. If at any time you do not want to receive such information then please contact our data manager in accordance with paragraph 6.1 below; and/or

4.2.2 we can gather Generic Data about which pages you visit on the Site, how long you stay on each page, and the route you took to navigate through the pages. This helps us monitor the accessibility of the Site and what your needs might be so that we can develop and improve the Site, in direct response to your requirements.

4.2.3 the general administration of customer records by us or by a Data Processor on our behalf;

4.2.4 the general maintenance of our database and other information databank by us or by a Data Processor on our behalf;

4.2.5 for security purposes to protect your Personal Data and Sensitive Personal Data (if any) held and/or processed by us or by a Data Processor on our behalf in accordance with the GDPR.

4.2.6 for training our employees or those of our Data Processors in respect of providing our goods and services to you.

4.3 When you enter our Site, your computer will automatically be issued with a cookie. Cookies in themselves do not identify the individual user, just the computer used. Many websites do this whenever a user visits their website in order to track traffic flows. See our Cookie Policy below for information on our cookies and if you wish to reject our cookies, you can configure your browser to do so, alternatively you can ask your internet browser to alert you when a cookie is being set up.

5. WHO ELSE GETS TO SEE YOUR PERSONAL DATA?

5.1 In light of the different purposes highlighted in paragraph 4 above we will from time to time need to disclose your Personal Data to various third parties. Before passing data to 3rd parties we will ensure that they are GDPR compliant. These third parties are:

5.1.1 when you access the Site to use any of our Products online as a user who has been granted access by an institution or organisation that has a licence from us to use the Product, the institution or organisation may have access to your Personal Data;

5.1.2 our Data Processors (which include without limitation: the persons who host the Site on our behalf; the persons who maintain, update and administer the Site on our behalf; the persons who carry out customer services on our behalf; and/or the persons who carry out any training on our behalf);

5.1.3 other companies which are part of the group of companies which we may be a part of from time to time; and/or

5.2 By accepting the provisions of this privacy policy you are consenting to the disclosure of your Personal Data in accordance with this privacy policy. We will not disclose your Personal Data to other third parties unless we have your permission to do so or where we are required by law to disclose such information.

6. IN THE EVENT OF A DATA BREACH

6.1 Users will be advised of any data breach within 72 hours of detection.

6.2 MYPROFILE will provide all reasonable and possible cooperation to report, manage and recover data in the event of a data breach.

6.3 In the event of a data breach, MYPROFILE will:

- Initiate an internal investigation to remedy the breach
- Report within 72 hrs to the ICO

7. YOUR RIGHTS

7.1 You have the right to object to your Personal Data and you can change your options in relation to the information you wish to receive at any time by contacting our data manager in writing by post or email as follows:

7.1.1 by post to: The Data Manager, Myprofile Pty Ltd, PO Box 1497, Sydney, NSW 1360 Australia

7.1.2 or by email to: mish@myprofile.com.au

7.2 As mentioned above, you can set your internet browser to refuse cookies or you can ask your internet browser to alert you when a cookie is being set up.

7.3 You have the right under the GDPR to request from us information as to what Personal Data we (or our Data Processors in so far as they are processing your Personal Data on our behalf) are processing about you. Such requests should be made in writing to our data manager (see contact details above). We reserve the right to charge a reasonable fee if the request is manifestly unfounded

or excessive. We will provide you with the relevant information within 1 month of receipt of the request.

7.4 You have other rights under the GDPR in relation to our processing of your Personal Data.

8. MAINTENANCE OF YOUR PERSONAL DATA

8.1 We are committed to keeping your Personal Data secure

8.2 Once your Personal Data is stored in our database or otherwise in electronic form by us (or our Data Processor on our behalf) it is password protected and is only accessible by our employees who are authorised to access such information (or those of our Data Processor on our behalf).

8.3 Any data (whether Generic Data, Personal Data, or Sensitive Personal Data) shall be held on our system for 3 years after the last use of our program, or for such time as is required to deliver services through our products or until such time as you inform us to cease sending you information.

8.4 When your licence expires or is cancelled any data (whether Generic Data, Personal Data, or Sensitive Personal Data) shall be held on our system for 3 years after the last use of our program.

8.5 Deletion of data

Erasure of Data (also known as 'right to be forgotten')

8.6 All data is held within the EU and Australia

We will respond to all requests to erase data within one month of receipt. Please see Section 6 for contact information.

9. GENERAL APPLICATION OF OUR PRIVACY POLICY

9.1 It should be noted that this privacy policy only applies to the collection and use of your Personal Data provided to us (directly or via our Data Processors on our behalf) and not to Personal Data you may provide directly to other persons or any third party advertisers to which links may be situated on the Site or Report. Each of these persons will have their own policies in respect of processing Personal Data you provide to them directly.

10. CONTACT INFORMATION

10.1 If you have any questions or queries about our processing or use of your Personal Data, you should write, in the first instance, to our data manager (see contact details at paragraph 6 above)

10.2 If you want to learn more about your rights regarding your Personal Data, you should contact the Information Commissioner's Office information line on (0044) 303 123 1113 or visit their website at ico.org.uk/.