

As a Registered Training Organisation, Pegasus International College has a responsibility to collect, use and store personal and sensitive information about students, clients and staff members. This policy outlines our principles and guidelines to meet our legislative obligations.

Policy Name	Privacy Protection Policy
RTO Name	Pegasus International College
RTO Code	46222
Standard	Standards for RTOs 2025 – Standards 4.1, 4.2, 4.3, 4.4 and Standard 20
Version	2.0
Effective Date	March 2026
Review Date	April 2027
Policy Owner	CEO

1. SCOPE

This policy applies to:

- All staff, learners, and clients; and
- All personal and sensitive information collected, used or stored by us.

2. SOFTWARE

- Moodle LMS (learning management, assessment delivery, and identity verification)
- Microsoft Teams (online class delivery and session recordings)
- Student Management System (enrolment records and student files)
- Payment platform (fee processing and receipting)
- Website content management system

3. RESPONSIBILITIES

CEO

- Ensures compliance with privacy laws and data protection policies.
- Oversees the implementation of secure data management practices.
- Approves privacy notices.

Administrative and Support Staff

- Manages the collection, storage, and secure handling of personal information.
- Responds to and facilitates requests for access, correction or complaints regarding personal information.

All Staff

- Complies with data protection protocols.
- Reports any suspected data breaches immediately.

4. DEFINITION OF PERSONAL AND SENSITIVE INFORMATION

Under the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (s6(1)), personal and sensitive information is defined as follows:

- **Personal information** – information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.
- **Sensitive information** – information or opinion about an individual's:
 - racial or ethnic origin, or nationality
 - indigenous status
 - languages spoken
 - political opinions or membership of a political association
 - religious beliefs, affiliations, or philosophical beliefs
 - membership of a professional or trade association, or a trade union
 - sexual preferences or practices
 - criminal record
 - health such as one's disability or long-term impairment status, and dietary requirements
 - genetics (that is not otherwise health information)
 - biometric (used for the purposes of automated biometric verification or biometric identification)
 - biometric templates

5. GENERAL PRINCIPLES

At Pegasus International College, we are committed to:

- Collecting, using, and storing personal and sensitive information in compliance with legislative and regulatory requirements, including the Privacy Act 1988 and the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020.
- Collecting personal and sensitive information in accordance with the Australian Vocational Education and Training Management Standard (AVETMISS).
- Ensuring transparency by notifying individuals of data collection purposes at the point of enrolment or as soon as practicable.
- Protecting personal and sensitive information from misuse, interference, and unauthorised access through secure systems and processes.
- Retaining personal information for a period of 30 years, as required by law, and securely disposing of data when it is no longer necessary for business purposes.

6. WHAT PERSONAL INFORMATION WE COLLECT

Pegasus International College collects only the information necessary to provide training and assessment services, meet regulatory obligations, and support learners. This may include:

9.1) Student Information

- Full name, date of birth, contact details
- Emergency contact details
- Enrolment records
- USI (Unique Student Identifier)
- Results and academic progress
- Attendance and participation data (where applicable)
- LLN and suitability assessment results
- Information disclosed by students relating to support needs
- Identification documents required for enrolment

9.2) Administrative and Compliance Information

- AVETMISS data
- Fee/payment information
- Course records and certificates
- Complaints, appeals, and incident reports
- Records of participation in online classes

9.3) Technical Information (Online Systems)

- LMS activity logs
- IP addresses when accessing systems
- Browser/device information for system security
- Online assessment submissions
- Identity verification data, including photographs captured by the LMS during assessment activities to confirm student authenticity

9.4) Professional Development Services (Optional)

If a student chooses to access optional fee-for-service professional development services such as resume review, interview preparation, or job-readiness coaching, Pegasus International College may collect additional personal information relevant to these services. This may include:

- Copies of resumes or cover letters
- Employment history
- Career goals or job application preferences
- LinkedIn profile information (if voluntarily provided)
- Skills summaries or professional background
- Any other information the student chooses to share for the purposes of receiving professional development support

This information is collected only with the student's consent and is not used for training, assessment, compliance reporting, or academic decision-making.

9.5) Audio and Video Recordings (Online Training and Assessment)

Pegasus International College may collect audio and video recordings of students during training and assessment activities. This may include:

- Participation in live online classes where student cameras or microphones are used
- LMS-initiated identity verification recordings
- Student-created video submissions used for assessment or competency evidence
- Recordings of presentations, role-plays, or practical demonstrations
- Class recordings used for training quality, moderation, or learner review
- Students are informed of recording practices during enrolment, orientation, and LMS access.
- Pegasus International College does not collect more information than is reasonably required.

7. HOW WE COLLECT PERSONAL INFORMATION

Pegasus International College endeavours to notify individuals of the collection of their personal and sensitive information before, or at the time of collection, or as quickly as possible thereafter, such as at enrolment. Notifications are usually made in writing but may be verbal.

Pegasus International College uses the following avenues to collect information:

- Student and client personal and sensitive information is collected directly from our students and clients using administrative tools such as enrolment forms, enrolment interview forms, recognition of prior learning application forms, credit transfer forms, complaint forms, appeal forms, payment refund forms, surveys and questionnaires. This information is entered into the Student Management System and the physical forms or documents are scanned into the learner's folder and stored electronically with any hard copies destroyed responsibly.
- Student and client personal information such as personal contact information may also be collected at the enquiry stage directly from individuals.
- Pegasus International College also collects information relating to our performance as an RTO and this information can be collected electronically or in hard copy formats. The responses are then collated, reviewed and analysed (where required), and any hard copies are then destroyed (if applicable).
- Staff personal and sensitive information is collected from individuals when they come in for an interview and upon commencement of their employment or contractual period with Pegasus International College.

If Pegasus International College should receive any unsolicited personal or sensitive information, it will be treated and managed according to the Australian Privacy Principles.

8. PRIVACY NOTICE

Clause 7.2 of Part B in the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020 specifies that Registered Training Organisations (RTOs) must inform students about the purposes for which their personal information is collected, used, or disclosed. This includes making students aware of the Privacy Notice outlined in Schedule 1 of the National VET Data Policy. Pegasus International College provides a Privacy Notice on our website and in our Student Handbook. Pegasus International College also provides a privacy notice at the start of the Enrolment Form so that students and clients are aware of the collection of their personal and sensitive information at the point of enrolment.

In our Privacy Notice, we outline the following information:

- Why we collect personal information;
- How we use the personal information collected;
- Who we are legally obliged to disclose the personal information collected to;

- How we disclose the personal information collected;
- How NCVER and other bodies handle the personal information collected;
- Surveys that students may receive from a government department of an NCVER employee, agent, third-party contractor or another authorised agency; and
- Who can be contacted to request access to the personal information we have collected, how to correct the personal information we retain, how to make a complaint about how the personal information collected has been handled, and to ask questions about the Privacy Notice.

9. HOW WE USE PERSONAL INFORMATION

Pegasus International College uses personal information for purposes including:

- Providing and improving training and assessment services
- Supporting students during their studies
- Identifying learner support needs
- Managing complaints, appeals, and incidents
- Complying with AVETMISS, ASQA, and government reporting
- Issuing qualifications and maintaining student records
- Managing online systems and LMS access
- Communicating important training or administrative information

9.1) Identity Verification and Assessment Integrity

Pegasus International College may use LMS-captured identity verification data (such as photographs or activity monitoring during assessments) to confirm student identity, ensure academic integrity, and meet regulatory requirements. This data is used solely for training, assessment, and compliance purposes and is not used for marketing.

9.2) Audio and Video Recordings

Pegasus International College may collect and use audio or video recordings created during:

- Online classes
- Assessment activities
- Student presentations or demonstrations

These recordings are used for:

- Verifying student identity and assessment integrity
- Assessing competency
- Supporting learning
- Moderation and validation
- Trainer development and continuous improvement

Recordings are used only for training, assessment, and quality assurance. They are not used for marketing unless the student has provided explicit written consent.

9.3) Storage, Access and Student Use of Recordings and Training Materials

Recordings are stored securely and are only accessed by authorised Pegasus International College staff, trainers, or assessors. Recordings are not shared externally unless required for regulatory audit, legal compliance, or assessment moderation.

Pegasus International College does not permit students to record online classes, training sessions, or assessment activities without prior written approval.

Students are strictly prohibited from sharing, distributing, publishing, or reproducing any Pegasus International College materials, including but not limited to:

- Class recordings
- Assessment materials
- Learning resources
- Trainer presentations
- LMS content
- Feedback or assessment commentary

These materials are provided solely for the student's personal study and assessment use and remain the intellectual property of Pegasus International College. Unauthorised sharing or distribution may result in disciplinary action and/or legal consequences.

9.4) Marketing Use

Pegasus International College will only use personal information (including photos, videos, or testimonials) for marketing where the individual has provided explicit written consent via a separate Student Consent Form.

10. ACCESS, DISCLOSURE, AND CORRECTION OF PERSONAL INFORMATION

Learners and third-party individuals or organisations may request access to the personal and sensitive information held by Pegasus International College where the information has been collected directly from individuals, subject to certain exceptions prescribed by the Australian Privacy Principles. Request for access to the personal and sensitive information should be made in writing. You can refer to our Record Keeping and Access Policy for more information on accessing personal information.

Pegasus International College does not sell or share your personal and sensitive information to third-parties for marketing purposes. We do not disclose any personal and sensitive information other than for the purpose which it was collected for, if an individual has consented to a secondary purpose or would reasonably expect, or if required to by law.

We are obligated to collect and disclose personal information to the National Centre for Vocational Education Research (NCVER), the Australian Skills Quality Authority, as well as any relevant State or Territory Training or Funding Authority in accordance with any legal or contractual obligations such as funding contracts and reporting obligations. Pegasus International College will inform and seek consent from the individuals concerned at the point of enrolment.

Under the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020, we are required to collect personal information about you and disclose that personal information to the National Centre for Vocational Education Research (NCVER). NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector. NCVER collects, holds, uses and discloses your personal information in accordance with the law, including the Privacy Act 1988 and the NVETR Act 2011. This information may be used and disclosed by NCVER to the Australian Government Department of Employment and Workplace Relations (DEWR), Commonwealth authorities, State and Territory

authorities (other than Registered Training Organisations) that deal with matters relating to VET and VET regulators for the purposes of those bodies, including to enable:

- Populating authenticated VET transcripts;
- Administering vocational education training, including program administration, regulation, monitoring and evaluation;
- Facilitation of statistics and research relating to education, including surveys and data linkage; and
- Understanding the VET market, such as how the VET industry operates, for policy development purposes, workforce planning and consumer data.

NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf and NCVER does not intend to disclose any personal information to any overseas recipients. You can refer to NCVER's Privacy Policy at www.ncver.edu.au/privacy for more information on how NCVER handles personal information.

NCVER also administers student surveys which may be run by an Australian government department, or an NCVER employee, agent, third-party contractor or another authorised agency, which learners are able to opt-out of when they are contacted.

We may also disclose personal information to individuals or organisations for the purposes of our operations, such as to a Compliance Consultant.

Whilst we endeavour to ensure the personal and sensitive information we collect, use or disclose is accurate, current, and complete, we rely on individuals to help us manage the accuracy, currency, and completeness of the information.

Where the information has changed or requires updating, Pegasus International College will update the information held in the Student Management System accordingly.

11. MANAGEMENT OF PERSONAL INFORMATION

Any personal and sensitive information collected is stored on servers in Australia. Pegasus International College does not retain any personal and sensitive information collected on servers overseas. We take steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure of the information.

Pegasus International College has systems and an internal network which is protected from unauthorised access and minimises the risk of unauthorised access. Data transferred over the internet through Pegasus International College's website, Moodle LMS, and the Student Management System is protected by a Secure Socket Layer (SSL) protocol. Access to our website, Moodle LMS and the Student Management System is protected through user log-on and password, and assignment of user access privileges.

All hard copy documents containing personal and sensitive information is to be scanned and saved in the respective folders, the information entered into the Student Management System or the relevant system or register, and the hard copy document shredded and disposed of securely. No personal and sensitive information should be left unsecured or in view of others who are not authorised to access it.

Pegasus International College retains personal information for a period of 30 years when personal information is no longer necessary for our business operations. Where it is lawful to do so, Pegasus International College will destroy the information by permanently deleting the relevant electronic files.

Individuals are advised to reach out to us should they have any concerns about the way we manage their personal and sensitive information, as well as about our Privacy Notice. They also have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of their personal information by Pegasus International College.

Pegasus International College takes reasonable steps to protect personal information; however, no online system can guarantee absolute security. Pegasus International College is not responsible for unauthorised

access, disclosure, loss, or corruption of data that occurs as a result of factors beyond its reasonable control, including failures of third-party systems, cyber incidents affecting external service providers, or events caused by external infrastructure or technology providers.

12. DIRECT MARKETING

Pegasus International College respects an individual's right to not receive any marketing material. We provide an option within our communications for individuals to unsubscribe from receiving any marketing material from us. We conduct our marketing communications and dissemination of service information in accordance with the Australian Privacy Principle 7 – Direct Marketing, the Spam Act 2003, and the Do Not Call Register Act 2006. It is not Pegasus International College's practice to make any unsolicited calls for the purpose of marketing our products and services.

13. GOOGLE ANALYTICS AND COOKIES

Google Incorporated provides a web service known as Google Analytics which gives businesses the ability to track and report website traffic, and the tools a business would need to better understand your customers and strategise our future operations. Cookies, which are packets of data that a computer receives, and then sends back without changing or altering it, are stored in a file located in the web browser. Cookies help our website track our visitors and their activity, and record log-in information.

These cookies are stored on Google's servers in the United States where they are used to generate reports on website activity. Google may transfer this information to third-parties, if required by law, or for information processing on its behalf.

No personal information is recorded through cookies, and cookies are only used for website management and improvement purposes. It is possible to disable cookies by changing a web browser's settings and to opt-out of Google Analytics.

14. USE OF ONLINE PLATFORMS AND DIGITAL DATA

Pegasus International College uses digital systems for training and assessment. By enrolling, students acknowledge that:

- LMS activity may be monitored for learning and compliance purposes
- Online classes may be recorded for training quality and evidence
- Assessment submissions may be checked through plagiarism or authenticity tools
- Technical logs may be captured for system security

Pegasus International College ensures all digital data collection complies with the Privacy Act and the APPs.

15. COMPLAINTS ABOUT PRIVACY

Anyone concerned about how their information is handled can lodge a complaint with Pegasus International College via the Complaints and Appeals Policy.

If not resolved, individuals may contact:

Office of the Australian Information Commissioner (OAIC)

www.oaic.gov.au

16. LEGISLATIVE AND STANDARDS COMPLIANCE

This policy aligns with the following:

Standards for RTOs 2025

Outcome Standards

- **Standard 4.1** – The RTO operates with integrity and is accountable for the delivery of quality services.
- **Standard 4.2** – Roles and responsibilities are clearly defined and understood.
- **Standard 4.3** – Risks to VET students, staff and the RTO are identified and managed.
- **Standard 4.4** – The RTO undertakes systematic monitoring and evaluation to support the delivery of quality services and continuous improvement.

Compliance Standards

- **Standard 20** – Compliance with laws.

Legislation

- National VET Data Policy – Part B, Clause 7.2
- National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020
- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (s6(1))

Failure to comply with this policy can have serious consequences, including but not limited to:

- **For the RTO** – breaches of legislation or regulatory requirements may result in financial penalties, loss of registration, or regulatory enforcement actions, and reputational damage.
- **For Staff Members** – staff found to have knowingly or negligently failed to comply with this policy and any associated legislative or regulatory requirements may face disciplinary actions.

17. CONTINUOUS IMPROVEMENT

- An internal audit is to be conducted at least once per year to assess our compliance with this policy and the relevant legislative and regulatory requirements. The audit schedule is outlined in our Continuous Improvement Schedule and areas for improvements are documented in our Continuous Improvement Register.
- A review of this policy is to be conducted at least once a year to ensure our compliance with this policy and the relevant legislative and regulatory requirements. The Continuous Improvement Schedule outlines when this review is to take place.
- Feedback from staff, learners, clients and industry stakeholders will be used to inform improvements to compliance processes and the effectiveness of our operations.

18. RELATED DOCUMENTS

- Feedback, Complaints & Appeals Policy
- Continuous Improvement Register
- Continuous Improvement Schedule
- Record Keeping and Access Policy
- Student Consent Form
- Student Handbook