Privacy Policy

Offcampus Pty Ltd ("Offcampus," "we," "us" or "our") ACN 631 886 774 have created this Privacy Policy to outline our practices regarding information we collect through our website, applications, interactive features and any services owned or operated by Offcampus as well as any information we collect offline and combine in our databases.

Offcampus collects personal information in accordance with the 'Information Privacy Principles' established in the *Privacy and Data Collection Act 2014.*

By accessing www.offcampus.com.au, you accept and agree to the Offcampus *Terms and Conditions*, which includes your consent to, and authorization of, the collection, use and disclosure of your personal information in accordance with this Privacy Policy.

1.0 Summary

We describe our privacy practices in full in this Privacy Policy. This summary provides a brief overview of important information regarding our use and sharing of your information. Please review our Privacy Policy in full before using our services.

Offcampus primarily collects personal information when you register with Offcampus. If your personal details change, it is your responsibility to update your Offcampus account with those changes, so that we can keep our records complete, accurate and up to date. You are not anonymous to Offcampus when you log into the Offcampus website or post any content (including questions, comments or feedback) on the Offcampus website.

Your personal information or profile with Offcampus is securely stored and is not publicly shared with other users, excluding your user ID (your first name and the first letter of your last name, i.e. John Smith is displayed as John S.) and profile avatar which is publicly displayed on Offcampus when you post content (including comments or feedback). Offcampus does not in any way control, and does not accept any responsibility or liability for, the disclosure or use of personal information which is voluntarily posted by you on the Offcampus website or in the use of its Services.

Offcampus may also receive and record information from your internet browser and computer, including IP addresses, cookies, software, hardware attributes and your page requests.

2.0 Collection of Personal Information and Usage Information

Offcampus may collect certain "Personal Information" and "Usage Information" upon registration and whenever you use the Services, including browsing content and publicly accessible information on www.offcampus.com.au.

2.1 Personal Information

Offcampus and its Services may collect "Personal Information" (which is information that can be used to identify or contact a specific individual, such as your name and email address), account information (such as a password or other information that helps us confirm that it is you accessing your account), and demographic or other information (such as your school, gender, age or birth date and postal code and information about your subjects and preferences). We will also collect payment information (typically card account information). All of the aforementioned 'information' will be combined and treated as "Personal Information."

Offcampus may use the information collected to provide the Services, including but not limited to:
- Identification and access to www.offcampus.com.au;
- Protecting Offcampus and the users of the Site;
- Customising the content and any advertising displayed on the Site;
- Providing, maintaining, protecting and improving our services;
- As required by law or if Offcampus reasonably believes the use or disclosure of the information is reasonably necessary for enforcement related activities;
- Develop new service features;
- Ensure that Offcampus receives payment of the fees due to us;
- Contact you (for example, to notify you about improvements or upcoming changes to our services); and
- Conduct research.

Your contact information may also be used for administrative, accounting, invoicing and billing and marketing purposes. When you contact Offcampus, we may keep a record of the communication(s) between you and Offcampus to help resolve any issues.

In the event that Offcampus collects, uses or discloses any information from you or about you that is not Personal Information, but is sensitive information, then Offcampus will seek consent directly from you each time. We will not use or disclose your sensitive information for any other purpose unless the purpose is directly related to the primary purpose for which your sensitive information was collected.

2.2 Usage Information

Offcampus may collect certain "Usage Information" whenever you use the Services, browse the content or publicly information available on www.offcampus.com.au or click on an Offcampus advertisement.

Usage Information may include the browser and operating system you are using, the URL or advertisement that referred you to our Services (if applicable), the terms or phrases you entered into a search engine that led you to Offcampus (if applicable), all of the areas within our Services and Site that you visit and the time of day you used the Services. Additionally, we automatically collect your IP address for any computer, laptop, mobile phone or other device used to access the Services.

Usage Information is generally non-identifying, but if we associate it with you as a specific and identifiable person, we treat it as Personal Information. Usage Information is collected via certain tracking technologies, including:

- **Cookies and Log Files:** Offcampus may uses cookies, log files or similar technologies for a number of purposes including tracking your usage of our Services, access to your information when you sign in, to keep track of your preferences, direct specific content to your dashboard, to report on Offcampus's user base and to improve Offcampus and its Services. In the event that you change the settings on your internet browser or block or restrict cookies, the Offcampus Services may not function properly and you may not be able to take advantage of certain Offcampus features. Two types of cookies we may use are known as a "persistent" cookie and a "session" cookie. A persistent cookie is set once you've logged into your account on Offcampus. If you do not log out of your account, then the next time you visit, the persistent cookies will allow us to recognize you as an existing user so you will not need to log in again. A session cookie is used to identify a particular visit. Session cookies expire after a short time or when you close your web browser.

- **An Embedded Script:** Offcampus may use programming code that is designed to collect information about your interactions with the Services, such as the links you click on. The code is temporarily downloaded from our service and is deactivated or deleted when you disconnect from the Services.

- **Flash & HTML**: Offcampus uses Local Storage Objects (LSOs) such as HTML to store content, information and preferences.

In addition, we may use a variety of other technologies that collect similar information for security and fraud detection purposes.

3.0 Your profile

When registering with Offcampus, you will create an account profile to use Offcampus and its Services, which consists of information about you, including Personal Information, your use of the Services and other information. Your Personal Information is collected and recorded by Offcampus and will be securely and privately stored. Your profile is not publicly viewable or accessible by any other users or third-parties besides yourself and Offcampus. You will be able to access your profile at any time to change, edit or update your account details as well as remove any information on your profile with Offcampus.

3.1 User Content

While using Offcampus, through the Services or otherwise, you may choose to submit or post content, such as questions, reviews, problems, suggestions, ideas, solutions, answers, class notes, course outlines, comments, testimonials, feedback, messages, images, videos, text or other material ("User Content"). Certain User Content may also be posted publicly based on the Services, but your Personal Information and profile will not be publicly viewable or accessible by any users or third-parties besides yourself and Offcampus. Please think carefully about what you post before including Personal Information in your User Content. You may edit or remove your profile information, but you may not be able to remove answers or postings or other uploaded User Content on some Services. To request removal of content you posted publicly on the Services, contact us at support@offcampus.com.au. We will honour removal requests at our discretion and whereby required by law. In some cases, we may remove only your Personal Information but maintain the User Content. Note that removal of public postings does not ensure complete or comprehensive removal of the content or information posted.

3.2 Protecting and Maintaining Personal Information

When you create an account with Offcampus, it is protected by a password for your privacy and security. Offcampus will ensure that all reasonable measures are in place to protect the information we hold about you. However, we cannot guarantee the absolute security of that information or that our systems will be completely free from interception or are incorruptible from viruses. We cannot and do not guarantee that information you send from your computer to us over the internet will be protected by any form of encryption. You transmit your Personal Information to us at your own risk. You are entirely responsible for maintaining the security of your passwords and/or account information.

3.3 Closing Your Account

If and when you wish to close your account with Offcampus, please deactivate your account using the Account Center and we will deactivate your profile from the active database with Offcampus. If you would like Offcampus to remove your Personal Information, please send your request to support@offcampus.com.au and we will honour

your request. However, information may remain in backup records and we may retain certain data if it may be necessary to prevent fraud or future abuse or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery or if required by law. All retained data will continue to be subject to the applicable Privacy Policy for Offcampus. Any User Content (including questions, comments or feedback) that you may have posted on or through the Services, will remain in our database and will not be deleted unless subject to inappropriate User Content.

4.0 Security

Offcampus takes commercially reasonable security measures to protect the Personal Information submitted to us, both during transmission and once we receive it. For example, when you enter sensitive information as a card account number and CVC number on our checkout forms, that information is encrypted to help protect the communications between you and our payment partners.

We take this information very seriously and will continuously improve our security measures to ensure safety.

However, no method of transmission over the internet is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. If you notice any suspicious or unusual activity, please email us at support@offcampus.com.au.

4.1 Questions and Comments

If you have any concerns, questions or comments about our Privacy Policy or require further information please email us at support@offcampus.com.au.

5.0 Review

This Privacy Policy will be reviewed on an ongoing basis to ensure that the terms of this policy remain up to date with the needs of those who use and/ or interact with Offcampus and its Services.

This policy was last updated on *24 May 2019*.