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|  **Current Version**  |  February 2023  |  **Responsibility**  | Ali Hughes - Learner Experience & Success Manager  |
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# **1. Purpose**

1. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division), provides Websites and Mobile Apps for delivery of courses both directly, and on behalf of, external partner organisations (including Tertiary Education Organisations) along with the provision of other services such as learner support, course design and development and professional development.
2. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) does its best to protect the privacy of the people participating in the eCampus NZ community including its learners, employees and others. This Privacy Policy sets out how eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) ensures this is done in accordance with the Privacy Act 2020 (and its subsequent amendments) and other applicable privacy laws.

# **2. Scope**

1. This Privacy policy applies to all Personal Information provided to, collected, generated and/or held by eCampus NZ (part of Te Pūkengā's Open Polytechnic business division).
2. Any individual who uses the Website agrees to the collection, use, disclosure, storage and processing of their Personal Information in accordance with this Privacy Policy.
3. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) may change this Privacy Policy at any time by posting an updated Privacy Policy on its website.

# **3. Definitions**

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| **eCampus NZ (part of Te Pūkengā's Open Polytechnic business division)**  | eCampus NZ (part of Te Pūkengā's Open Polytechnic business division),   |
| **IPPs**  | Information Privacy Principles.  |
|  **Learner**  | A past, present or prospective learner who has, is, or intends to enrol in a course through the Website.  |
|  **Personal Information**  | Any information about an identifiable individual (an individual is ‘a natural person other than a deceased natural person’).  |
| **Privacy Act**  | Privacy Act 2020  |
|  **Privacy Officer**  | eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) Learner Experience & Success Manager or such other person identified by eCampus NZ as the Privacy Officer of the Privacy Act.  |
| **eCampus NZ**   | eCampus NZ (part of Te Pūkengā's Open Polytechnic business division)  |
|  **Website**  | The online tertiary education website provided by eCampus NZ including its technology platforms and digital tools.  |

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# **4. Principles How eCampus NZ collects Personal Information**

1. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) complies with the Privacy Act 2020.
2. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) will maintain confidentiality on a need-to-know basis at all times.
3. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) provides education-related services directly and/or to TEOs and other external partner organisations. Personal information required for service provision provided to partners or directly to eCampus NZ will be collected and used for the purpose for which it has been provided.
4. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) will manage any complaints of interference with privacy fairly, swiftly and effectively in accordance with the relevant current legislation and eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) policies.
5. The Privacy Act 2020 sets out thirteen Information Privacy Principles (IPPs) which form the basis on which all issues of the privacy of personal information are determined. Everyone who has access to the personal information eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) collects and/or holds must understand and comply with these basic principles.

# 5. **Associated procedures for the eCampus NZ policy on: Privacy**

## ***5.1 How eCampus collects Personal Information***

eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) collects information in different ways:

**5.1.1** Direct Collection

eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) collects information directly from individuals. Direct collection includes information provided by an individual:

1. as part of eCampus NZ's marketing, recruitment, enrolment and employment processes and operations;
2. through use of the Website;
3. through participation in surveys and competitions; and
4. through correspondence with eCampus NZ (part of Te Pūkengā's Open Polytechnic business division).

**5.1.2** Automatic Collection

Ecampus NZ (part of Te Pūkengā's Open Polytechnic business division) collects information automatically through the use of the Website (including cookies), emails and other services.

**5.1.3** Third Party Collection

Ecampus NZ (part of Te Pūkengā's Open Polytechnic business division) may collect information from third parties such as organisations involved in eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) service provision including TEOs.

## **5.2 What Personal Information eCampus NZ Collects**

**5.2.1** Learners

If an individual is a learner, the information eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) collects may include:

1. biographical details (including name, former name, gender and date of birth);
2. contact details (including address, telephone, email and emergency and alternative contact details);
3. education record and academic/research history;
4. citizenship or residency information;
5. country of origin and ethnicity;
6. national student number;
7. any other information the Learner provides in connection with their enrolment;
8. information about how a Learner uses the eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) services;
9. statistical information about visits to the Website (e.g. IP address, search terms used, pages accessed on the Website and the links clicked on, date and time the site was visited, referring site (if any) which was used to click through to the website, operating system used (e.g. Windows XP, Mac OS X, etc.), type of web browser used (e.g. Internet Explorer, Mozilla Firefox, etc.)); and
10. Learner analytics; learner information relating to course engagement and assessments.

**5.2.2** Employees and contractors

If an individual is an employee or contractor for eCampus NZ (part of Te Pūkengā's Open Polytechnic business division), the information eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) collects may include:

1. biographical details (including name, former name, gender and date of birth);
2. contact details (including address, telephone, email and emergency and alternative contact details);
3. education record and academic/research history;
4. professional affiliations;
5. previous employment history (e.g. CV);
6. bank account and tax information;
7. citizenship or residency information;
8. country of origin and ethnicity;
9. criminal convictions, credit history and other pre-employment vetting and verification information;
10. health and disability information;
11. interactions and communications with eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) and the Website;
12. information provided through reference checking processes;
13. other information shared with eCampus NZ (part of Te Pūkengā's Open Polytechnic business division); and
14. statistical information about Website access and engagement (e.g. IP address, search terms used, pages accessed on the Website and the links clicked on, date and time the site was visited, referring site (if any) which was used to click through to the website, operating system used (e.g. Windows XP, Mac OS X, etc.), type of web browser used (e.g. Internet Explorer, Mozilla Firefox, etc.)).

**5.2.3***.* Other association with eCampus NZ

If an individual has had some other association with eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) (for example, they have attended an event held by eCampus NZ), the information eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) could collect may include:

1. biographical details (including name, former name, gender and date of birth);
2. contact details (including address, telephone, email and emergency and alternative contact details);
3. interactions and communications with eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) and the Website;
4. other information shared with eCampus NZ (part of Te Pūkengā's Open Polytechnic business division); and
5. statistical information about Website access and engagement (e.g. IP address, search terms used, pages accessed on the Website and the links clicked on, date and time the site was visited, referring site (if any) which was used to click through to the website, operating system used (e.g. Windows XP, Mac OS X, etc.), type of web browser used (e.g. Internet Explorer, Mozilla Firefox, etc.)).

**5.2.4** Supply of personal information

Subject to the individual of concern's rights under law, if eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) is not provided with Personal Information that is requested, then eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) may be unable to provide the individual of concern with certain services.

## **5.3 What eCampus NZ does with the information it collects**

**5.3.1** The Purposes

Ecampus NZ (part of Te Pūkengā's Open Polytechnic business division) collects Personal Information to carry out its operations, functions and activities as an online tertiary education provider and as an employer and eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) will use the Personal Information it collects to:

1. provide the eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) services and benefits to learners, TEOs and other external partner organisations;
2. manage the business of the TEOs, other external partner organisations, including business and performance intelligence, internal reporting, administrative processes and the selection of scholarship and prize winners;
3. administer and improve the website, improve services or communicate with Website users;
4. administrative and management activities;
5. communicate with Learners or with learner's emergency/alternative contacts;
6. verify academic records;
7. fulfil any legal, regulatory and contractual obligations (including legislation relating to the maintenance of records) and provide evidence of the same;
8. monitor, evaluate and improve performance and effectiveness of the of the business-- its processes, services and products;
9. provide an appropriate level of student support;
10. promote equality, diversity and inclusion;
11. improve services by analysing non-identifiable web traffic data;
12. carry out audits to ensure eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) is meeting the expected standards or to verify payroll and other financial transactions; and monitor and support learner progress and success.

 (together the "**Purposes**")

Personal Information must not be collected, generated, retained, released or in any way used by eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) for any other purpose than the Purposes except with the authorisation of the individual concerned.

**5.3.2** Disclosure of Personal Information to Third Parties

 eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) discloses the Personal Information it holds to its employees, contractors, agents, advisors, auditors and service providers who need to use the Personal Information for the Purposes and who have agreed to deal with the Personal Information in accordance with this Privacy Policy.

The Personal Information of a learner held by eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) will be shared with the learner's enrolling TEO, and may be shared with other TEOs and external agencies:

* Those staff at other TEOs, who may be accessing the eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) platform to facilitate blended delivery and/or support of course/s, may also have access to information of learners that are not enrolled through their own TEO.
* Those who administer the tertiary education system, including allocating funding, developing policy advice for government and conducting statistical analysis and research.
* Those responsible for audit, academic review, and moderation activities, professional bodies for accreditations or membership purposes, and agencies for financial support and pastoral care.
* Industry bodies that support eCampus NZ (part of Te Pūkengā's Open Polytechnic business division)’s service delivery

Such agencies include, but are not limited to:

* the Ministry of Education
* Statistics NZ
* New Zealand Qualifications Authority (NZQA)
* the Ministry of Social Development (including Work and Income New Zealand and StudyLink)
* Immigration New Zealand (for students who are not New Zealand citizens)
* Other education organisations for the verification of Academic Records
* Relevant professional bodies
* Relevant industry bodies
* Moderation and accreditation bodies
* The Tertiary Education Commission (TEC)
* Education New Zealand

Personal Information will only ever be shared to third parties who have agreed to treat the Personal Information in a manner consistent with New Zealand’s privacy laws.

Any 'user' of eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) infrastructure must comply with eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) policies and procedures, including those in relation to Data, Information and Privacy.

eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) will not communicate with learners’ parent/s, guardian/s, partner, caregiver or other whānau about their learning without written consent.

Learners should ensure that they have read any privacy policies or statements published by their enrolling TEO or other external partner describing how it will use and secure Personal Information.

There are other circumstances where eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) will share Personal Information with other parties to support its service delivery. eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) will only do this where it is strictly necessary for the Purposes or it is permitted or required by law.

# **6. Accessing and updating Personal Information**

An individual has the right to ask for a copy of their Personal Information held by eCampus NZ (part of Te Pūkengā's Open Polytechnic business division), and to ask for it to be corrected if it is wrong.

# **7. Storage and security of Personal Information**

 eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) applies best practice industry standard security practises to ensure all reasonable steps are taken to keep your information safe and secure. This includes enterprise level authentication access control and data security practices.

# **8. Retention of Personal Information**

eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) retains Personal Information for as long as is necessary for the Purposes and for it to comply with its legal and contractual obligations.

# **9. Privacy Officer**

1. The Privacy Officer can assist with the interpretation or clarification of this Privacy Policy and is authorised to make or approve exceptions to this Privacy Policy.
2. The Privacy Officer is the eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) Learner Experience & Success Manager
3. The Privacy Officer should be familiar with the Privacy Act and the contents of this Policy. The Privacy Officer's responsibilities include:
4. leading privacy compliance;
5. providing education and guidance to eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) employees and contractors regarding privacy practices and requirements;
6. dealing with requests made to eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) for access to, or correction of, Personal Information under the Privacy Act; and
7. assisting the Privacy Commissioner in relation to investigations.

# **10. Contact us**

Any questions about this Privacy Policy or any request for access to, or correction of, Personal Information or to make a complaint, please contact eCampus NZ (part of Te Pūkengā's Open Polytechnic business division) in the following ways:

Email: enquiries@tanzeCampus.com

Telephone: 0800 328 269

Attention: Student Advisor

# **11. More information about privacy**

This Privacy Policy is governed by New Zealand law. For more information about privacy issues in New Zealand and protecting privacy, visit the New Zealand Privacy Commissioner's website: [www.privacy.org.nz](https://www.privacy.org.nz/).