

User Privacy Policy Skills Academy Program

Effective Date: 6 September 2023 | To be reviewed: Quarterly

Soldier On cares about your privacy rights. Sometimes we need to use your personal information (data) to help us provide you with our Services. This policy talks about when we might use your personal information. It also covers how we look after your personal information and how you can make a complaint.

By agreeing to this Privacy Policy, you are consenting to Soldier On collecting and using your personal information in the ways talked about in this Policy.

This policy answers a lot of questions, including:

- What personal information does Soldier On collect and why?
- How does Soldier On collect my personal information?
- Who does Soldier On share my personal information with?
- How does Soldier On keep my personal information safe?
- When will Soldier On erase my personal information?
- What rights do I have over my personal information?
- How can I make a complaint?
- How will changes be made to this policy?

You can email us at info@soldieron.org.au for more information about how we use your personal information. You can also contact our offices at:

Suite 5, Building 2, Brindabella Business Park

When does this policy apply?

This policy applies to Soldier On Ltd (“Soldier On”, “us”, “our”, “we”). It applies to all of our services including our Website, Jobs board and Portal, Customer Relationship Management Platforms, User Registrations, or any other service delivery tool provided by any of the service delivery teams.

In short, this policy applies whenever we do something with your personal information.

What is personal information?

“Personal information” means any information that could identify a living person. This includes things like names, email addresses and phone numbers. It also includes information that can “indirectly” identify a person. This can happen when small bits of information are combined to identify someone.

What types of personal information does Soldier On collect?

Soldier On may collect personal information about you, including:

- a. **Identity Information** (e.g. your name, birthdate, age, gender, your answer to a security question)
- b. **Contact Details** (e.g. your email address, phone number and address)
- c. **Employment and Education** (e.g. your job titles or roles, the number of years you’ve been in a position or field, or your highest level of education)
- d. **Engagement Information** (e.g. your progress through the HELP Model, what courses you’ve completed, how you have performed in job applications, events you’ve attended, etc.)
- e. **Usage Behaviours** (e.g. when you log on, which pages you visit, whereabouts you click and how you solve problems)
- f. **Personality Information** (e.g. your approach to teamwork, your team working skills, your other skills, talents and motivations)

By agreeing to this Privacy Policy, you are giving your consent for Soldier On to collect the types of personal information listed above.

When will Soldier On collect my personal information?

We only collect and use your personal information when we have a “lawful basis”. This can happen in four situations:

- a. **Consent.** You consent to us using your personal information. We talk [more about consent below](#).
- b. **Contract (Suppliers, corporate partners).** We can use your personal information to help us prepare a contract for you. Preparing a “contract” includes when we use your personal information to create an account. We can also use your personal information to fulfill a contract we have with you.
- c. **Legal Obligation.** We can use your personal information to enable us to fulfill our legal obligations. For example, we might need to store your payment details for tax reasons.
- d. **Legitimate Interest.** We can collect and use your personal information when we have a “legitimate interest”. We talk [more about “legitimate interests” below](#).

[The table below](#) outlines which lawful bases we use when we collect or use your personal information.

Your right to withdraw consent

You have the right to withdraw your consent at any time. However, we might have to stop offering you services that relied on your consent. This may mean that we will have to terminate your account. We will tell you how withdrawing your consent could impact the services we offer.

You can withdraw your consent by emailing info@soldieron.org.au. You can also email us to ask how withdrawing your consent will impact the services we offer you.

When will Soldier On have a “legitimate interest” to use my personal information?

We can collect and use your personal information for our “legitimate interest”. However, we won’t use this basis if we can achieve our interests without using your personal information.

Our “legitimate interests” include everything you’d expect that the organisation should be able to do. It includes our commercial and legal interests. For example, we have legitimate interests in:

- Keeping information on our participants and users
- Marketing
- Fraud prevention
- IT security
- Being able to make future legal claims or defences, and
- Being able to share information about possible outcomes or opportunities for participants.
- Third Party supplier requirements

Our “legitimate interests” also include the broader interests of society.

We balance our legitimate interests against your interests. We will not use your personal information for our legitimate interests if it would significantly impact your interests.

If we rely on our legitimate interests, we will document why we believe our interests outweighed yours. You can ask for a copy of this document by emailing info@soldieron.org.au.

Why does Soldier On collect my personal information?

We collect the minimum amount of personal information necessary for us to achieve our purposes. By agreeing to this Privacy Policy, you are giving your consent for Soldier On to use your personal information for the purposes listed below.

Our purposes include:

- Registering you as a participant.** For example, asking for your email address so that we can contact you.
- Verifying your identity.** For example, sending you an email if you forget your password.

- c. **Sharing reports about your performance with our services** with your employer, training organisation, funding bodies or other organisations. For example, sending your training results to your employer.
- d. **Grouping your information with the information of other participants** to create group-level data. For example, combining your job placement with the placement of other people to create a placements average. This group-level data might be shared with others.
- e. **Sharing information about your engagement, achievements and username with other users.** For example, sharing your user name and achievements with Soldier On Staff cross functionally.
- f. **Recommending content for you.** For example, recommending new courses based on what you previously studied.
- g. **Recommending content for other users.** For example, using information about what courses you've enjoyed to recommend courses to users who are similar to you.
- h. **Improving our services.** For example, looking at what you click on most to make things more accessible.
- i. **Sending you messages about your account.** For example, emailing you if your subscription is about to expire.
- j. **Sending you marketing information.** For example, emailing you a copy of our newsletter.
- k. **Giving your personal information to possible employers.** For example, sending your information to a company looking for someone with your skills.
- l. **Responding to complaints.** For example, emailing you to tell you what actions we have taken to address your complaint.
- m. **Complying with our legal obligations.** For example, sharing your personal information with law enforcement agencies where we have a legal obligation to do so.

So, what types of personal information does Soldier On collect and why?

This table summarises why we collect your personal information.

Purpose/Activity	Type of Information Involved	Lawful Basis
Registering you as a participant	(a) Identity Information and service information (b) Contact Details	(b) Contract
Verifying your identity	(a) Identity Information and service information (b) Contact Details	(a) Consent
Sharing reports about your performance on our services	(a) Identity Information and service information (c) Employment and Education (d) Engagement Information (f) Usage Behaviours (h) Personality Information	(a) Consent
Grouping your information with the information of other users	(d) Engagement Information (e) Skills (f) Usage Behaviour	(a) Consent
Sharing your engagement with other users	(a) Identity Information and service information (d) Engagement Information (e) Skills (f) Usage Behaviours	(a) Consent
Recommending content for you	(a) Identity Information (c) Employment and Education (d) Engagement Information (f) Usage Behaviours (h) Personality Information	(a) Consent
Recommending content for other users	(a) Identity Information (c) Employment and Education (d) Engagement Information (f) Usage Behaviours (h) Personality Information	(a) Consent
Improving our services	(a) Identity Information and service information (d) Engagement Information (f) Usage Behaviours	(a) Consent

Processing payments – Vendors	(a) Identity Information (b) Contact Details (g) Payment Information	(d) Necessary for our legitimate interest to be paid
Sending you messages about your account	(a) Identity Information (b) Contact Details (d) Engagement Information (f) Usage Behaviours	(a) Consent
Sending you marketing information	(a) Identity Information and service information (b) Contact Details (c) Employment and Education (d) Engagement Information (f) Usage Behaviours (h) Personality Information	(a) Consent
Giving your personal information to possible employers	(a) Identity Information and service information (b) Contact Details (c) Employment and Education (d) Engagement Information (e) Skills (f) Usage Behaviours (h) Personality Information	(a) Consent
Responding to complaints	(a) Identity Information (b) Contact Details (f) Usage Behaviours	(d) Necessary for our legitimate interest to protect our services
Complying with our legal obligations	(a) Identity Information (b) Contact Details (c) Employment and Education (d) Engagement Information (f) Usage Behaviours (g) Payment Information (h) Personality Information	(b) Legal obligation

How does Soldier On collect my personal information?

We collect your personal information in two ways:

1. You give us your personal information

You might give us your personal information. You might tell us your name, age, and email address when you create an account. You might also tell us about your employment and education history, or give us your payment information.

We might ask for information about your gender. We use this information to promote equity goals.

2. We automatically collect your personal information

We collect personal information from you as you use our services. This includes information on your progress through our HELP Model. It also includes information about how you use our services. We record information about when you log on, which pages you visit, whereabouts you click. We also record things like your IP address and the type of browser you used.

Who does Soldier On share my personal information with?

We might share your personal information with third parties, including:

- **A potential employer, third party service provider or event organiser.** We might share your personal information with your employer, education institution or an event organiser. We do this when you are using our services because of them. For example, you're using our services as part of your involvement in a social connections program, and as part of HELP model and the third-party provider is providing a service while Soldier On run the event.
- **Payment processing (Companies).** We might share your name, contact details and payment information with another company to help us protect and process the information. For example, we might share your information with a third party who can better manage payments.
- **Email service providers.** We might share your information with a third party to help us communicate with you. For example, we might use a third-party tool to send you personalised content.

- **Security and fraud prevention companies.** We might share information about how you've used the services to help security companies identify any risks to our services.
- **Data and analytic software providers.** We might use third party software to monitor your engagement. We might also use third party software to help us gather better data.
- **Companies interested in your talents.** We might share your personal information with companies who are interested in hiring you. You can withdraw your consent to this at any time.

By agreeing to this Privacy Policy, you are giving your consent for Soldier On to share your personal information with the types of third parties listed above.

How will Soldier On protect my personal information if they send it overseas?

Sometimes, we might send your personal information overseas (for example, IP addresses stored when collecting survey results via a third-party provider, such as SurveyMonkey). We take steps to make sure that any personal information we send overseas will be protected.

We only send your personal information overseas if:

- The country we are sending your personal information to has an "adequate data protection framework" as determined by the European Commission's adequacy decisions.
- We are sending your personal information to a company that has binding rules that will protect your data.
- We have a binding agreement with the party that will ensure your data is secure.
- You have consented to us sending your personal information overseas.

You can email us for more information about who we might share your personal information with. To contact us, email info@soldieron.org.au.

How does Soldier On keep my personal information safe?

Soldier On takes steps to keep your personal information secure.

Data Minimisation and Storage Limitation

We only collect as little personal information as necessary for us to achieve [our purposes](#). We also delete any personal information after we no longer need it ([more on this below](#)). These strategies help us limit the potential harm of any data breach. If we don't have it, they can't steal it.

Technical Measures

We've taken technical steps to protect your personal information. We remove your name from the rest of your data wherever we can. This makes it harder for an attacker to identify you. We also use end-to-end encryption when we transmit your data. This makes it harder for any attacker to read the information that we send to third parties.

Other Measures

We have taken steps to ensure that our whole team knows what they can do to protect your personal information. Our employees participate in training on email, internet and cyber security. We don't give employees access to your personal information unless they absolutely need it. These steps help limit the chance for things to go wrong.

When will Soldier On erase my personal information?

Generally, we delete or anonymise personal information once we no longer need it for [our purposes](#). However, our legal obligations or legitimate interests might mean we keep the information for a bit longer.

This table outlines when we will erase your personal information.

Situation	Types of Personal Information	When we will Delete or Anonymise your Personal Information
You registered an account, but you never verified your account	Identity information, contact details	We delete your personal information 28 days after you started registering
You create an account, but you either withdraw your consent or terminate your account	Name, email address, addresses, phone numbers, audit logs, IP addresses	Unless we need it for legal reasons, we delete this information immediately.
	Payment information	Unless we need it for legal reasons or legitimate interests, we delete this information after you have paid us any money that you owe us.
	Age, gender, progress information, achievements, engagement information, usage behaviours	Unless we need it for legal reasons, we will anonymise this information immediately
	Employment and education information, competencies and personality information	We delete any aspects of this information that might identify you immediately. We will keep the rest in an anonymised format.

We take steps to ensure that you cannot be connected with any anonymised information. We will delete any anonymised information if we believe it may still identify you.

What rights do I have over my personal information?

You have rights over your personal information. We are committed to helping you enjoy these rights.

Your right to access your personal information

You have a right to access the personal information we keep about you. This includes information about:

- What personal information we have about you
- Why we use your personal information.
- Who we share your personal information with
- How long we plan to keep your personal information for
- Where we collect your personal information from
- Proof of your consent (if we're relying on your consent)
- Why we thought our legitimate interests outweighed your interests (if we're relying on our legitimate interest)

You can ask for a copy of this information by emailing info@soldieron.org.au. We will provide you with a copy for free. You can ask to receive your information in a certain format. This may help you share your personal information with other people.

We will need to verify your identity before we give you a copy of your personal information. We might ask you to confirm some of your personal information to help us verify your identity. We will aim to give you a copy of your information within 28 days from when you have verified your identity.

We will try to give you your personal information in the format you want. However, there might be some situations where we cannot do this. We will tell you why we couldn't give you your information in the format you wanted if we give you your information in a different format.

We might not give you certain bits of information if we believe this is necessary to protect the rights of other people. If this happens, we will tell you why we didn't give you full access.

If you aren't happy with how we handle your request, you can tell us by emailing info@soldieron.org.au. You can also send a complaint to someone outside Soldier On ([more on this below](#)).

Your right to correct your personal information

We try our best to keep our records up to date. However, you can ask us to correct your personal information if you believe we have missed something. To contact us, email info@soldieron.org.au

Your right to erasure

You have the right to ask us to erase your personal information. We will erase your information by following the process [outlined above](#). To ask us to erase your personal information, email info@soldieron.org.au

We might not be able to offer you certain services if you erase your personal information. We will tell you which services will be impacted before we erase your personal information.

Your right to restrict how we use your personal information

You can ask us to not use your personal information for certain purposes. You can make this request if:

- You believe we are using inaccurate personal information about you, and you want us to stop using it until we have corrected it
- We have been using your personal information unlawfully
- We no longer need the personal information for one of [our purposes](#), but we need to keep it for legal reasons
- You are challenging our "legitimate interest" to use your personal information

To ask us to restrict how we use your personal information, email info@soldieron.org.au.

We can still store your personal information even if restrictions are in place. If your information is restricted, we will tell you before we start using it again.

How can I make a complaint?

We will work with you to help you enjoy your privacy rights. You can contact us about any concerns you might have by emailing info@soldieron.org.au

You can also complain to somebody outside of Soldier On. Your options will vary depending on where you live.

Australian Users can [send a complaint](#) to the Office of the Information Commissioner. More information about making a complaint can be [found here](#).

For other users, you can email us and we will help you find somebody to send a complaint to. You can also get legal advice for more information on how you can take your complaint further.

How will changes be made to this Policy?

We may change this policy over time. The effective date is shown at the top of this policy. We will change the effective date whenever we update our policy. We will also include a short explanation of any changes made at the start of our policy.

We will tell you if we make any changes to this policy. We encourage you to come back to this policy from time to time so that you know how we are using your personal information.