

Privacy Policy – Industry Graduates

This Privacy Policy was last updated in April 2026.

1. General

- 1.1 Industry Graduates Pty Ltd ABN 23 112 710 591 and its related entities (**Industry Graduates, we, us, our**) is committed to protecting your privacy and complying with its obligations under the Privacy Act 1988 (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**) and other privacy laws that may apply in respect of collecting personal information.
- 1.2 This Privacy Policy is subject to change at our discretion, and we will update it from time to time. The current version will always be available on our website at www.industrygraduates.com. If we change this Privacy Policy in any material way, we will post a notice on our website (as relevant) along with the updated Privacy Policy.
- 1.3 In this Privacy Policy, we use the terms:
- (a) 'students' to refer to students, learners, trainees, apprentices, and prospective participants;
 - (b) 'clients' to refer to individuals who engage us to provide workforce consulting services, to design and operate academies, and to provide other information, goods, and services, and individuals at businesses who engage us to provide workforce consulting services, to design and operate academies, and to provide other information, goods, and services (such as employer representatives, supervisors, managers, and authorised contacts);
 - (c) 'partners' to refer to education and training partners, and individuals who are representatives at RTOs and other education or training partners;
 - (d) 'suppliers' to refer to individuals who provide us with goods or services, and individuals at businesses who provide us with goods or services (including contractors, consultants, and other business contacts);
 - (e) 'visitors' to refer to individuals who engage with us on our website, online portals, and digital services, or who enquire about our functions or activities via electronic means;
 - (f) 'applicants' to refer to individuals who apply for employment or other engagement with us.
- 1.4 In some circumstances, you may belong to more than one of these groups, and multiple sections of this Privacy Policy will then apply to you.

2. What personal information do we collect?

- 2.1 The kinds of personal information we collect about you depends on our relationship with you, and we limit the information we collect to what is reasonably necessary for one or more of our functions or activities. Generally, we will collect your name, commentary or opinion about you, and other information relevant to providing you with the information, goods and services (as applicable) you or someone on your behalf are seeking.
- 2.2 If you are a student, we will also collect your full name, preferred name and title, date of birth, gender, postal and residential address, telephone number and email address, emergency contact details, identity documentation (for verification purposes), government-related identifiers and information connected with regulated training or subsidy requirements and eligibility, employment details (including employer

name, position, work location, work history, role responsibilities, and manager or supervisor details), education and training history, qualifications, statements of attainment and learning records, student identifiers, enrolment details, participation records, progress/completion information, and data from your interaction with our portals and platforms (including user activity, engagement, interaction data, and learning activity and progress). We will also collect sensitive information about you including health information (such as information relevant to participation, support needs, or reasonable adjustments, disability or learning support information), racial or ethnic background, and other sensitive information you volunteer to us from time to time.

- 2.3 If you are a client, we will also collect your contact details, business name, ABN (for sole traders and partnerships), information about your role, marketing and communications preferences; and information related to your interactions with us.
- 2.4 If you are a partner, we will also collect your contact details, business name, ABN (for sole traders and partnerships), information about your role, marketing and communications preferences; and information related to your interactions with us.
- 2.5 If you are a supplier, we will also collect your contact details, ABN (for sole traders and partnerships), business name, bank account details (for payment of your invoices), and information about your role.
- 2.6 If you are a visitor, we will also collect your email address, information about your use of our website and the device you are using (including dates and times of access, referring websites or links, user activity, engagement, and interaction data, device information, IP address, browser type, geographic location of your IP address and device where that is relevant to the services and information we are providing, cookie information, and user preferences). You may choose to enable or disable information you share with us via the website in your browser or device settings. Disabling the sharing of some information may affect your ability to use certain features of the website, and your visitor experience generally.
- 2.7 If you are an applicant, depending on your potential or actual position with us, we will also generally collect your personal information contained within an application and CV/resume, employment history, personal information derived from a reference, personal information derived from an interview, personal information derived through testing (including psychometric or aptitude testing, as applicable), licences and other certificates and qualifications, and information included in a passport, birth certificate, visa or other documentation demonstrating your right to work in Australia.
- 2.8 We support your ability to make decisions about the personal information you provide to us, however if you choose not to provide us with the information requested, or it's incomplete or inaccurate, we may not be able to provide you with the information, goods, and services you are seeking. If you are a student, refusal to provide personal information may mean we are unable to If you are an applicant, refusal to provide personal information may mean we are unable to process your application.

3. How we collect your personal information

- 3.1 We will generally collect personal information directly from you when you interact with us, such as in person, by email, by phone, by enquiry or feedback form, through interaction with our employer programs, workforce capability and development services, academies, microcredential service, career pathways and coaching services, talent pool and job opportunity services, partner-delivered programs, or via our website and online portals (including the Ignite platform and other learning or development portals we operate), social media channels, interviews (via any method), any of our standard forms (including application, registration, and enrolment forms), subscription to our newsletter, attendance at our events, contract negotiation, our employment and engagement application process, our surveys (where applicable), or any other means when you provide us with your personal information. This

includes when you create an account or update your profile on any of our portals or platforms, upload documents or evidence, or provide consent or acknowledgements online (including through platform notices and checkbox confirmations).

- 3.2 We may also need to collect personal information about you from third parties from time to time where it is necessary for us to do so and it is unreasonable or impractical to collect directly from you, where you have consented to us doing so, or where we are otherwise required to or authorised to by law. Those third parties include:
- (a) if you are a student: third parties acting on your behalf; RTOs and other training or education partners you have applied to or enrolled with; from past, current and prospective employers; referees; recruitment platforms; government agencies; and publicly available information;
 - (b) if you are a client or partner: from students;
 - (c) if you are a client, partner, or supplier: your employer; and publicly available records such as the Australian Securities Investment Commission, and Australian Business Register;
 - (d) if you are a visitor: technology service providers and social media platforms;
 - (e) if you are an applicant: referees when they provide references, academic institutions or training and certification providers, providers of licence and background-checking services, recruiters and other service providers who assist in the engagement process, and other publicly available sources such as social media platforms.
- 3.3 Except as otherwise permitted by law, we only collect sensitive information about you if you consent to the collection of the information and if it is reasonably necessary for the performance of our functions and activities. Consent may be implied by the circumstances existing at the time of collection (for example, where you volunteer sensitive information to us). There may also be circumstances under which we may collect sensitive information without your consent, as required or authorised by law.
- 3.4 If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that information to us and that, without us taking any further steps required by applicable privacy laws, we may collect, store, use and disclose such information for the purposes described in this Privacy Policy. Where we request you to do so, you must assist us with any requests by the individual to access or update the personal information you have collected from them and provided to us.

4. Why do we collect, hold, use and disclose your personal information?

- 4.1 We will generally collect, hold, use, and disclose your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and:
- (a) to facilitate our internal business operations, including:
 - (i) establishing our relationship with you;
 - (ii) maintaining and managing our relationship with you, and communicating with you in the ordinary course of that relationship;
 - (iii) providing workforce capability consulting and related services
 - (iv) designing, delivering and managing development programs, academies, pathways and microcredentials
 - (v) supporting students with development, coaching and progression;

- (vi) reviewing engagement, progress, participation, capability and learning activity within our portals and platforms
 - (vii) coordinating services with clients and partners;
 - (viii) assessing suitability, readiness, progression and support needs;
 - (ix) maintaining records of enrolment, participation, completion and outcomes;
 - (x) verifying identity and manage accounts;
 - (xi) facilitating talent pool, employment pathway, or job opportunity processes;
 - (xii) updating your personal information, including destroying or de-identifying it when it is no longer relevant (to the extent applicable);
 - (xiii) fulfilling our legal requirements, both at law and under our contractual arrangements with you;
 - (xiv) protecting our lawful interests, systems, people, and property;
 - (xv) analysing our goods and services (including our platforms and portals), and student, client, partner, and supplier needs with a view to developing new or improved goods, services, and business operations;
 - (xvi) conducting market research and monitoring use of our goods and services;
 - (xvii) contacting you to ask for your feedback or a testimonial;
 - (xviii) if you are a supplier: purchasing goods or services from you, and enquiring about your products and services;
 - (xix) if you are a student, client, partner, or visitor: streamlining and personalising your experience within our website and portals, and tailoring our information, goods and services for you; and
 - (xx) if you are an applicant, considering your application with us.
- (b) to provide you with information about other goods and services that we or our related entities and other unrelated organisations offer that may be of interest to you. You may unsubscribe from our mailing/marketing lists at any time by using the unsubscribe feature on any emails we send, or otherwise by contacting us in writing. We do not use your sensitive information for direct marketing purposes;
 - (c) to de-identify and aggregate personal information about you and your use of our goods and services to improve the quality of our goods and services, and for research purposes. After we delete personal information, we may retain de-identified and anonymised information (that can no longer be associated with you) and may continue to use this de-identified data indefinitely without further notice to you; and
 - (d) for any other purpose identified at the time of collection.

4.2 We may use or disclose personal information for secondary purposes where it would be reasonable to expect us to do so, and that secondary purpose is related (or directly related in the case of sensitive information) to the primary purpose set out above.

5. Personal information of minors

Some of our students are under 18 years of age.

We believe it is important to provide added protection for minors, and we will use all reasonable efforts to only collect personal information about minors with the knowledge and/or consent of parents and guardians.

The way we do this may vary depending on the way in which we interact with the minor. Where consent is required, we may obtain this in different ways, such as requiring a physical or digital form to be signed and provided.

6. Who we disclose personal information to

6.1 We generally disclose your personal information for the purposes for which it was collected (set out above). We may disclose personal information about you to:

- (a) our related entities;
- (b) our employees, contractors, consultants and other parties who require the information to assist us with the purposes for which it was collected, and with establishing, maintaining or terminating our relationship with you;
- (c) government departments, agencies, and funding bodies where required or authorised by law;
- (d) third party service providers who assist us in operating our business and providing information, resources, goods and services to you or someone else on your behalf (including insurers, IT and technology service providers, recruitment, screening, and talent management providers, and professional advisers such as lawyers, accountants, and auditors);
- (e) third parties to whom you have agreed we may disclose your information and where the information was collected from you (or from a third party on your behalf) for the purposes of passing it on to the third party;
- (f) third parties you would reasonably expect us to disclose your personal information to;
- (g) any other entity as otherwise required or authorised by law, including regulatory bodies;
- (h) if you are a student: to clients, and partners; and
- (i) if you are a client or partner: to students.

6.2 We take reasonable steps to ensure third parties to whom we disclose personal information are subject to adequate confidentiality, privacy and security obligations.

6.3 We may expand or reduce our business, and this may involve the sale and/or transfer of control of all or part of our business. Personal information, where it is relevant to any part of the business for sale and/or transfer, may be disclosed to a proposed new owner or newly controlling entity for their due diligence purposes, and upon completion of a sale or transfer, will be transferred to the new owner or newly controlling party to be used for the purposes for which it was provided.

7. Direct marketing

7.1 We will only send you direct marketing communications and information about our goods and services via mail or email with your consent (which may be implied in some circumstances).

- 7.2 If you do not provide your consent to receive direct marketing communications, you may opt-out of receiving marketing communications from us by contacting us at the details below or by using the opt-out facilities provided in our communications.
- 7.3 We may provide your name and contact details to other organisations for the purposes of their direct marketing where we reasonably believe the goods and services of those organisations will be of interest to you. If you do not want your personal information disclosed to such third party organisations, please let us know.
- 7.4 Our practices in regard to our emails are designed to be compliant with anti-spam laws, including Australia's *Spam Act 2003* (Cth) and the *Do Not Call Register Act 2006* (Cth). If you believe you have received communications in violation of these laws or any other anti-spam law, please contact us using the contact information in this Privacy Policy

8. Overseas disclosure

- 8.1 We are assisted by a variety of external service providers to operate our business and to provide you or someone else on your behalf with the information, goods, and services sought. Some of these service providers are located overseas in New Zealand, the UK, Singapore, and the EU. These jurisdictions may change from time to time as our technology stack changes.
- 8.2 We take reasonable steps to ensure service providers who are based outside of Australia have appropriate security for your personal information and use it only for the purposes for which it was collected.
- 8.3 If you would like more information about likely overseas disclosures in relation to a particular service or platform, please contact us using the details below.

9. Cookies, pixels, and web beacons

- 9.1 Our websites use cookies, pixels and web beacons (**Tracking Tools**), including through the use of third party service providers.
- 9.2 A "cookie" is a small data file placed on your machine or device which lets our digital service store information. Cookies are not executable programs and cannot do anything to your computer.
- 9.3 A pixel or web beacon is a code snippet embedded on a web page or email that collects data about user interactions and behaviour. Pixels are often used for remarketing (that is, serving targeted ads on social media platforms or other websites).
- 9.4 The main purpose of cookies is to identify users to create a personal record of when that user visits our website or portals and to prepare customised web pages for them so that we may provide our services more effectively. We may also use cookies to monitor the use of our website and portals, like the numbers and frequency of visitors, to help us improve our services and identify any problems that need fixing. If you choose not to accept cookies from our website or portals, you will not be able to maintain a session-based interaction and will be treated as an anonymous browser.
- 9.5 Our website and portals also use a number of third party services that utilise Tracking Tools. Use of your personal information by these third parties is also subject to their own privacy policies. For details on how each provider uses information collected through Tracking Tools, please refer to their respective websites. The third party services we use include :
- (a) Google Analytics and Google Tag Manager, for audience measurement and website optimisation;

- (b) Meta Pixel for advertising analytics and remarketing on Meta platforms such as Facebook and Instagram;
 - (c) LinkedIn Insight Tag for advertising analytics and remarketing on LinkedIn;
 - (d) HotJar for user experience analytics such as heatmaps and session insights; and
 - (e) Microsoft/Bing UET Tag for audience measurement and advertising analytics
- 9.6 The information that is disclosed in relation to third party cookies is:
- (a) information about your use of our website, your IP address, browser type, ISP, and referring/exit pages;
 - (b) pseudonymous identifiers such as cookie, browser and session IDs
 - (c) session metrics such as your session start time, duration, pages per session and engagement time; and
 - (d) website engagement metrics such as clicks, time spent on pages and scroll behaviour.
- 9.7 Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our websites. You may also adjust your browser settings or use browser extensions to block other Tracking Tools. However, please note that if you do this, you may not be able to use the full functionality of our websites.

10. How we store and protect personal information

- 10.1 We store your personal information in different ways, including in paper and electronic form (such as via email, cloud platforms, learning systems, document repositories, and CRM tools). We take all reasonable measures to ensure your personal information is stored on secure servers (which may be based in Australia or overseas) in a manner that reasonably protects it from interference, misuse and loss and from unauthorised access, modification or disclosure, including electronic and physical security measures, including:
- (a) limiting access to the personal information we collect about you;
 - (b) access controls and role-based permissions;
 - (c) password protection and multifactor authentication where available;
 - (d) secure hosting and managed cloud systems;
 - (e) staff training and confidentiality obligations;
 - (f) secure disposal and de-identification processes;
 - (g) monitoring, backup and incident response measures;
 - (h) only providing access to personal information once proper identification has been given; and
 - (i) contractually requiring third party providers to have acceptable security measures to keep personal information secure.
- 10.2 When we no longer need your personal information for the purpose for which we collected it, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most

of the personal information is or will be stored and kept by us for a minimum of seven years (unless legislation requires us to destroy or permanently de-identify it sooner).

- 10.3 Despite the reasonable steps we take to secure your personal information, if you provide any personal information to us via our Platforms (including email) or if we provide personal information to you by such means, the privacy, security and integrity of your personal information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

11. Accessing or correcting your personal information

- 11.1 You may access the personal information we hold about you, subject to certain exceptions. If you wish to access your personal information, please contact us via the below:

Email: info@industrygraduates.com

Phone: 1300 039 000

Post: Industry Graduates Pty Ltd, 2/338 Turbot Street, Spring Hill, QLD, 4000

- 11.2 There are no charges for requesting access to or the correction of your personal information, however we reserve our rights to charge you any reasonable administration fees associated with your request. We will notify you in advance of any applicable fees.
- 11.3 We endeavour to respond to those requests within 30 days, but will otherwise respond within a reasonable period. We may decline a request for access to personal information in circumstances prescribed by the Privacy Act. If we decline a request for access, where reasonable, we will provide you our reasons and information about your ability to complain about such refusal.
- 11.4 If you are client personnel, we may not be able to provide you with the requested information and in those circumstances will recommend that you contact the client who has engaged you.
- 11.5 In order to protect the confidentiality of your personal information, details of your information will only ever be passed on to you where we are satisfied that the information relates to you. Accordingly, we may request documentation from you which confirms your identity before passing on any personal information which relates to you.
- 11.6 If you believe the information we hold about you is incomplete, not up to date, or is inaccurate, please advise us as soon as practicable. We will take reasonable steps to correct the information if we agree that it is incomplete, out of date, or inaccurate. We will strive to process any request within 30 days.

12. Making a complaint

- 12.1 Complaints about our Privacy Policy or the way we handle your personal information should first be directed to us at the details set out above.
- 12.2 We will investigate and attempt to resolve your complaint in accordance with the Privacy Act. If you are not satisfied with the outcome of this process, then you may contact the Office of the Information Commissioner, Australia. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

13. Further information

- 13.1 If you require any further information or have any queries regarding our Privacy Policy, please contact our Privacy Officer at the details set out above.
- 13.2 Should you wish to read more information on the Privacy Act, we recommend that you visit the website of the OAIIC at www.oaic.gov.au.