



National Accreditation Authority for Translators and Interpreters LTD

1.0 PREAMBLE

The National Accreditation Authority for Translators and Interpreters Ltd (ABN 42 008 596 99) (referred to in this Policy as 'NAATI', 'our', 'we' or 'us') is committed to protecting the privacy of personal information. Personal Information collected by NAATI, like other organisations operating in Australia, is protected by the Privacy Act 1988 (Cth) ('the Act') and associated legislation.

NAATI adheres to the Australian Privacy Principles ('APPs') contained within the Act which regulate how organisations may collect, use, disclose and store personal information and how individuals may access and correct personal information held about them.

By using our products or services, visiting our website (www.naati.com.au) or giving us your personal information, you agree to your information being collected, stored, used and disclosed as set out in this Privacy Policy.

2.0 DEFINITIONS

Under the Act:

'personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether or not recorded in a material form.

'sensitive information' (a type of personal information), means information or an opinion about an individual's race or ethnic origins, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, trade or professional associations and memberships, union membership, criminal record, health or genetic information or biometric information.

3.0 COLLECTION OF PERSONAL INFORMATION

3.1 Who does NAATI collect personal information from?

NAATI collects personal information from people seeking NAATI's products and services, including from:

- Candidates seeking a NAATI credential or requesting information about NAATI credentials;
- Candidates wishing to attend workshops designed to help them obtain NAATI credentials;
- Currently credentialed translator and interpreters, e.g. to update their personal details; attend professional development courses and workshops; recertify their credentials; or with other certification related enquiries;
- Candidates applying for other forms of non-certification tests from NAATI;
- People wanting to locate a certified translator or interpreter or to verify a practitioner's credentials;
- People wanting to subscribe to NAATI publications, enrol in online training courses or purchase NAATI products including via our website www.naati.com.au;
- People seeking employment with NAATI;
- People (including representatives of organisations) with whom NAATI does business, e.g. suppliers, contractors and advisers who provide goods and services to NAATI; and
- Ministers and officials of government agencies and bodies with whom NAATI has contact, representatives and staff; and for NAATI's government funded projects.
- People who lodge a complaint about a NAATI credentialed practitioner.
- Institutions delivering NAATI Endorsed Qualification courses.

3.2 What personal information does NAATI collect and hold?

NAATI collects the following personal information:

- Contact information including names, addresses, e-mail addresses, phone numbers, photographs and other contact details;
- Copies of correspondence (e.g. emails, facsimiles, file notes of discussions) between individuals and NAATI;
- Payment details, e.g. people purchasing NAATI products and services including publications, workshops, test fees, assessment fees accreditation and recertification fees;
- For certified translators/interpreters, as well as applicants for certification - NAATI collects personal information specific to people's credential or application for accreditation credential, e.g. proof of identification (including photographs), date and country of birth, residency/citizenship status, education and experience, test materials and results, location, and records of attendance at workshops and seminars;
- Information about staff and directors as required in the normal course of human resource management, corporate administration and business operation;
- Records of people's enquiries about translators and interpreters;
- NAATI customer information including purchase and payment history;
- Supplier details including goods and services provided to NAATI by individuals; and
- Complaints received by a third party against a Practitioner.

We do not collect sensitive information unless the individual has consented to the collection of the information (by filling in a form or otherwise disclosing that information to us) and the information is reasonably necessary for one or more of NAATI's functions or activities, or the collection is required or permitted by law.

3.3 How does NAATI collect personal information?

NAATI only collects personal information by fair and lawful means. NAATI usually collects personal information directly from the person to whom it relates, e.g. when a person:

- Applies for certification or recertification as a translator or interpreter;
- Requests or acquires a product or service from us, e.g. publications and workshops;
- Contacts us to verify a credential held by a translator or interpreter, or to locate a certified translator or interpreter;
- Provides a service or product to us;
- Applies for employment with us;
- Registers or logs onto the myNAATI portal or accesses the NAATI Online Directory via our website;
- Otherwise communicates with us via our website, by e-mail, telephone or in writing, or if a person meets with us;
- Complaints made to us by a third party; or
- Any other fair and reasonable means.

Sometimes NAATI collects personal information about an individual from a third party or a publicly available source, but only if it would be unreasonable or impracticable to collect the personal information from the individual.

We may also collect personal information through:

- Video surveillance in public areas of our buildings for safety and security purposes;
- Recording information that individuals give us, e.g. if we record telephone conversations with individuals for training and monitoring purposes (which we only do with the individual's consent when they call us, and individuals will have the option to 'opt out' of recording); and
- Via our website through the use of Cookies (NAATI uses cookies when you are logged in, in order to recognise you across different services and devices. This prevents you having to log in every single time you visit a new page. Individuals can control cookies through their browser settings. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in).

3.3 How does NAATI collect personal information?

If you provide personal information about someone other than yourself, you agree that you have that person's consent to provide the information for the purpose for which you provide it to us. You also agree that you have told the person about this Policy and where to find it.

3.4 Why does NAATI collect personal information?

NAATI collects personal information for the following purposes:

- To provide you with our products and services which you have requested from us, including use of NAATI's Online Directory;
- For marketing purposes and to provide you with information about our services which may be of interest to you;
- To improve the products and services we provide; and
- To enable us to conduct our business, including processing payments and meeting our legal and regulatory obligations.

3.5 How does NAATI deal with unsolicited personal information?

If we receive personal information about you that we have not requested, and we determine that we could not have lawfully collected that information under the APPs had we asked for it, we will destroy or de-identify the information if it is lawful and reasonable to do so.

3.6 Do you have to disclose your identity when dealing with us?

Where lawful and practicable, we will give you the option of interacting with us anonymously or using a pseudonym. However, in certain instances, we may not be able to allow you to access particular services if you don't provide the required personal information. We will inform you at the time this happens and explain to you the reasons why the information is required.

4.0 HOW DOES NAATI USE & DISCLOSE PERSONAL INFORMATION?

4.1 How does NAATI use personal information?

NAATI only uses personal information for the purpose for which it is provided to us, for related purposes or as required or permitted by law. NAATI may use personal information for the following purposes:

- for applicants – to establish an applicant's eligibility to sit for a NAATI test, assess and record the outcome of applications; certify translators and interpreters, including recertification of credentials;
- for currently certified or recognised practising translators and interpreters – to provide NAATI's Online Directory and the myNAATI portal which can be used to manage their NAATI details and receive information about news, events and NAATI products and services, e.g. NAATI training, workshops and publications. NAATI provides individuals with the ability to opt-out of direct marketing communications; and
- for NAATI's internal and general business management – to maintain NAATI's database of credentialed translators and interpreters; to conduct NAATI's business activities including billing, account management and general enquiries; to manage our relationships with directors, members and their representatives, staff and applicants for employment, suppliers and advisers, and government stakeholders; and to meet our legal and regulatory obligations.

NAATI will only use or disclose an individual's sensitive information for the purpose for which it was collected, with the individual's consent, or if required or permitted by law.

If you do not provide us with your personal information, we may not be able to supply our services to you, employ you or otherwise deal with you.

4.2 How does NAATI disclose personal information?

NAATI verifies the credential status of translators and interpreters upon enquiry. The information disclosed includes a Practitioner ID, NAATI Customer Number (or NAATI number), name, credentials held, dates when credentials were awarded and will expire and recertification status.

Such enquiries are usually from potential clients and employers via NAATI's online verification tool on the NAATI website – to access click on the 'Verify Practitioner Credentials' button on the homepage of the NAATI website.

NAATI may disclose:

- Applicants' personal information including the applicant's name and contact details to test supervisors in Australia and overseas to administer any type of NAATI testing at overseas testing venues;
- Personal information of certified translators and interpreters, including name, NAATI credentials, contact details, address and credential history, to people making enquiries via NAATI's Online Directory;
- Personal information in connection with NAATI's online verification tool used for credentialed translators and interpreters;
- Personal banking details (e.g. credit card, bank details, etc) to a bank or other financial institution but only if specifically required to process a transaction, and ensuring appropriate security to safeguard the information;
- Details of prizes and scholarships awarded to applicants and credentialed translators and interpreters, including the individual's name and prize/scholarship details, which NAATI may disclose to the public with permission from the person being awarded;
- Necessary personal information to third parties who we engage to provide products or services to us, or on our behalf, e.g. training and workshops;
- Personal information to our external advisers, e.g. where disclosure is reasonably required to obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct;
- As required or permitted by law (e.g. under subpoena or summons); and
- Preparation of products supplied to Practitioners.

Any direct marketing communications will advise recipients how they can opt out of receiving such marketing-related communications. Except as outlined above, NAATI won't disclose personal information without the individual's consent.

Except for applicants who request testing at an overseas test venue, NAATI does not disclose personal information overseas unless required or permitted by law.

5.0 HOW DOES NAATI STORE PERSONAL INFORMATION & FOR HOW LONG?

5.1 How does NAATI keep personal information secure?

We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification and disclosure. Such steps include:

- Physical security over paper-based and electronic data storage and premises;
- Computer and network security measures, including use of firewalls, password access and secure servers, encryption for online financial transactions and employee policies about IT security;
- Restricting access to personal information to NAATI's directors and employees and those acting on our behalf who are authorised and on a 'need to know' basis;
- Secure destruction of physical copies of personal information;
- Retaining personal information for no longer than it is reasonably required, unless we are required by law to retain it for longer; and
- Entering into confidentiality agreements with staff and third parties.

NAATI stores personal information of applicants and accredited translators and interpreters on separate files for each individual, either electronically and/or in hard copy.

5.2 For how long does NAATI keep personal information?

NAATI keeps personal information for as long as the information is required for the purpose for which it was provided. It is generally kept for a further period of seven years. Where NAATI no longer requires your personal information, including where we are no longer required by law to keep records relating to you, we will ensure that it is de-identified or destroyed.

6.0 HOW CAN I ACCESS OR CORRECT MY PERSONAL INFORMATION?

6.1 How can I access my personal information?

Under the Act, individuals may generally have access to personal information held about them. If an individual requests access to the personal information we hold about them, or requests that we change that personal information, we will allow the individual access unless we consider that there is a sound reason under the Act, or other relevant law to withhold the information. If we deny you access to the information, we will notify you of the basis for the denial unless an exception applies. NAATI does not provide applicants access to test materials.

Individuals may view their personal information during NAATI's normal office hours by appointment only. All requests to view personal information must be made in writing and may take up to 10 working days to process. The viewing of personal information must be done in the presence of an authorised NAATI staff member at a NAATI Office and proof of identification must be shown by the individual.

NAATI test candidates and Credentialed translators and interpreters may also view their personal information at any time using the myNAATI portal.

6.2 How can I correct my personal information?

An individual who believes that personal information held by NAATI is incorrect must notify NAATI in writing of the relevant corrections. NAATI test candidates and Credentialed translators and interpreters may choose to update their personal information at any time using the myNAATI portal.

Requests for changes to such details as personal identity, name or qualifications must be made in writing to NAATI's National Office and accompanied by documentary evidence in support of the request. We will deal with your request within a reasonable time.

If we do not agree with the corrections you have requested (for example, because we consider that the information is already accurate, up to date, complete, relevant and not misleading), we are not required to make the corrections. However, where we refuse to do so, we will give you a written notice setting out the reasons.

7.0 HOW CAN I COMPLAIN ABOUT A BREACH OF PRIVACY?

Individuals who consider that a breach of privacy in relation to personal information held by NAATI may have occurred should note their concern in writing to the NAATI Chief Executive Officer in the first instance.

Mail

Chief Executive Officer
National Accreditation Authority for Translators and Interpreters Ltd
PO Box 223
Deakin ACT 2600

You will need to provide us with details of your complaint and any supporting evidence and information. We will review all complaints and respond to you as soon as practicable.

If you are not satisfied with our response, or you require further general information about privacy protection, you can contact the Office of the Privacy Commissioner by visiting their website at www.oaic.gov.au.

8.0 POLICY REVIEW

NAATI reserves the right to review this privacy policy or any part of it from time to time, and will do so at least annually. Please check this policy periodically for changes. Any revised privacy policy will be placed on our website at www.naati.com.au.

An individual's continued use of our website, products or services, applying for credentials, requesting our assistance, or the provision of further personal information to us after this privacy policy has been revised, constitutes the individual's acceptance of the revised privacy policy.

9.0 POLICY APPROVAL

This privacy policy is approved by the Chair of the NAATI Board of Directors, pursuant to a resolution of the Board.