



## NAATI PRIVACY POLICY 2014

### 1.0 Preamble

The National Accreditation Authority for Translators and Interpreters Ltd (NAATI) 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* and associated legislation. NAATI adheres to the Australian Privacy Principles (National Privacy Principles) contained within the *Privacy Act 1988* which regulate how organisations may collect, use, disclose and store personal information and how individuals may access and correct personal information held about them.

### 2.0 Policy Outcomes

This Policy is intended to inform people who deal with NAATI, including applicants for NAATI products and services, about:

- the kinds of 'personal information' that NAATI may gather;
- how that information may be used;
- how that information may be shared or disclosed;
- the choices individuals have regarding NAATI's use of their personal information; and
- how individuals may correct personal information held by NAATI about them or make a privacy complaint.

This Policy applies to all personal information collected by NAATI.

### 3.0 Definitions

Under the *Privacy Act 1988*:

'**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.

### 4.0 Collection of personal information

#### 4.1 Who does NAATI collect personal information from?

NAATI collects personal information including from:

- candidates seeking NAATI accreditation or requesting information about accreditation;
- candidates wishing to attend workshops designed to help them obtain accreditation;
- currently accredited translator and interpreters, e.g. to update their personal details; attend professional development courses and workshops; revalidate their credentials; or with other accreditation related enquiries;

- people wanting to locate an accredited translator or interpreter or to verify a practitioner's credentials;
- people wanting to subscribe to NAATI publications or purchase NAATI products including via our website [www.naati.com.au](http://www.naati.com.au);
- people seeking employment with NAATI;
- board members and staff;
- 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.

#### 4.2 What personal information does NAATI collect?

NAATI collects personal information including:

- contact information, e.g. names, addresses, e-mail addresses, phone numbers, 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, and accreditation and renewal fees;
- for accredited translators/interpreters, as well as applicants for accreditation - NAATI collects personal information specific to people's accreditation or application for accreditation, 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; and
- supplier details including goods and services provided to NAATI by individuals.

We do not collect sensitive information unless the individual has consented to the collection of the information (e.g. 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.

#### 4.3 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 accreditation or accreditation renewal as a translator or interpreter;
- requests or acquires a product or service from us, e.g. publications and workshops;
- contacts us to verify accreditation of a translator or interpreter, or to locate an accredited translator or interpreter;
- provides a service or product to us;
- applies for employment with us;
- registers or logs onto the NAATI online directory via our website; or
- otherwise communicates with us via our website, by e-mail, telephone or in writing, or if a person meets with us.

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; and
- 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).

#### 4.4 Why does NAATI collect personal information?

NAATI collects personal information for the purposes described in paragraph 5 of this policy (*How and why does NAATI use and disclose personal information?*).

#### 5.0 How and why does NAATI use and disclose personal information?

##### 5.1 How and why 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.**

Individuals do not have to provide us with their personal information. However, without their personal information, NAATI may be unable to interact further with the individual, e.g. process an application for accreditation.

NAATI may use personal information:

- **for applicants** – to establish an applicant's eligibility to sit for a NAATI test, assess and record the outcome of applications; accredit translators and interpreters, including Revalidation of credentials;
- **for currently accredited translators and interpreters** – to provide NAATI's Online Directory which accredited translators and interpreters can use 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 accredited 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.

##### 5.2 How does NAATI disclose personal information?

NAATI verifies the accreditation status of translators and interpreters upon enquiry. The information disclosed includes NAATI number, name, credentials held, dates when credentials were awarded and will expire and Revalidation status.

Such enquiries are usually from potential clients and employers via NAATI's online verification tool on the NAATI website – to access click on '*NAATI Online Login or Register*' then on '*Verify Practitioner Credentials*'.

NAATI may disclose:

- applicants' personal information including the applicant's name and contact details to test supervisors in Australia and overseas to administer accreditation tests at overseas testing venues;
- 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 accredited 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; and
- as required or permitted by law (e.g. under subpoena or summons).

NAATI may also disclose personal information which it collects for direct marketing of NAATI products or services. 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. For example, NAATI won't disclose an applicant's test results, or other information about an applicant, to their spouse, other family member, sponsor or agent without the applicant's consent. NAATI may provide particular consent forms for these and other types of consent.

Except for applicants who request testing at an overseas test venue (see below for overseas testing), NAATI does not disclose personal information overseas.

#### *Information for applicants who request testing at a test venue outside Australia*

NAATI conducts accreditation testing in Australia and New Zealand. For applicants wishing to sit tests at other overseas test venues, NAATI may disclose the applicant's personal information to supervisors located at a NAATI test venue located in:

- Argentina
- China
- England
- Greece
- India
- Iran
- Kenya
- Pakistan
- Peru
- Philippines
- Saudi Arabia
- Singapore
- South Africa
- United Arab Emirates
- Zimbabwe

By applying for overseas testing, the applicant consents to NAATI disclosing their personal information to supervisors located at the overseas NAATI test venue and on the following basis. Any overseas disclosure does not affect NAATI's commitment to safeguarding the applicant's personal information. In some circumstances NAATI's contracts with overseas test supervisors require them to comply with the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth). However, by applying for overseas testing, the applicant acknowledges and agrees that NAATI won't be:

- required to take reasonable steps to ensure the overseas supervisors' compliance with the APPs in relation to the applicant's personal information; or
- liable to the applicant for any breach of the APPs by the overseas supervisor.

## 6.0 How does NAATI store personal information and for how long?

### 6.1 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, and encryption for online financial transactions;
- 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;
- 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.

### 6.2 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.

## 7.0 How can I access or correct my personal information?

### 7.1 How can I access my personal information?

Under the *Privacy Act 1988*, 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 *Privacy Act 1988*, or other relevant law to withhold the information. 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.

### 7.2 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 (Application to Amend Personal Details). Requests for changes to such details as personal identity, name or qualifications must be 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.

## 8.0 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

Further general information about privacy protection can be obtained from the Office of the Privacy Commissioner by visiting their website at [www.oaic.gov.au](http://www.oaic.gov.au)

## 9.0 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](http://www.naati.com.au).

An individual's continued use of our website, products or services, applying for accreditation, 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.

## 10.0 Policy Approval

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



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Kerry Stubbs  
Chair NAATI Board of Directors  
Date: 21 November 2014