



The University of Papua New Guinea

Online Privacy Policy

The University of Papua New Guinea (“University” or “UPNG”) is committed to safeguarding, and maintaining, the privacy of all personal information. In providing its Website and services, the University collects, uses, and processes personal data when users visit the Website. This Privacy Policy describes the practices that are related to the collection and processing of personal information, when users visit the University’s Website.

For the purpose of clarity, “processing”, as used in this policy includes the collection, use, storage, transmission, disclosure, and destruction of personal information. This Privacy Policy applies to all information that is collected by the University and its third-party service providers, including, but not limited to, websites and applications that post a link to this Privacy Policy.

By continuing to use and interact with the University’s Website and by providing your personal information, you are accepting the terms of this Online Privacy Policy.

PURPOSE

This Policy discloses the practices with respect to the gathering and dissemination of information which the University obtains from the users of the University’s Website.

This Policy applies to those sites for which UPNG is the operator, although software, hosting, and other functions may be provided by Third Parties (“Service Providers”).

This Online Privacy Policy describes the types of information which UPNG and its Service Providers collect from the visitors to our sites, what we do with that information, and how visitors can update and control the use of the information that is provided on this Site. This Policy does not necessarily describe information collection policies on other sites, such as separate sites that are operated by our Service Providers, and over

which we do not have control. Many of the resources that are linked from this Website are not maintained by UPNG. UPNG cannot monitor all linked resources, only those pages which fall directly within the University's worldwide web structure. UPNG is in no way responsible for the privacy practices or the content of these linked resources and the statements, views, and opinions expressed therein. They are neither endorsed by, nor do they necessarily reflect, the opinions of the University.

This Policy may be changed from time to time, without further notice. The continued use of the university sites after any such changes constitutes an acceptance of the new terms. If a visitor does not agree to abide by these new terms or any future terms, he or she should not use the sites. These sites are not directed to children under 13 years of age. Children under 13 years of age must not use these sites to submit any personal information about themselves.

POLICY STATEMENT

1. Information that We Gather

The University may collect certain information that is automatically generated when a user visits a site, including, but not limited to, the Internet Protocol address of the originating Internet Service Provider, together with information which is provided by "cookies" that are stored on your hard drive. We may also collect aggregate information about the use of the sites, including, but not limited to, which pages are most frequently visited, how many visitors access our website each day, and how long visitors stay on each page. A visitor may be prompted, or required, to provide certain personal information in order to access various features and information on the sites. Such information may include, among other things, names, addresses, phone numbers, and so on. If a visitor does not want to provide such information, he or she may choose not to access those features of the sites. Any personal information which is provided through the sites will be protected in accordance with the provisions of this Policy.

2. Use of Information

The University uses the information that it collects to maintain and improve the Website and in connection with marketing activities. We also collect information only for the application and registration of our academic programs and research. Some information

may be shared with Third-Party Vendors with whom the University contracts to complete business transactions (Banks, DHERST, and so on), provide services, or conduct online marketing of the University. These websites or Third-Party Vendors may also use “cookies” for tracking purposes.

The University may disclose and publish information on an aggregate basis to any party through any means. However, such aggregate information **will not** disclose any personal information. Any information that is collected through these sites may also be used in aggregate forms by system administrators in the administration of the sites.

The University strives to maintain the privacy and accuracy of personal information. We do not actively share personal information that is gathered from the sites with commercial enterprises within PNG or overseas. However, some information that is collected from the sites may be subject to distribution to sponsors (provincial governments) or potential employers, as the university’s measure to put students in a job placement. This means that, while we do not actively share information, in some cases, we may be required, by law, to release information that has been gathered from the sites.

3. Security and Accuracy of Confidential Information

The University cannot guarantee that the personal information which is obtained from a visitor is accurate. In the event that there is an error in collected information, the University will attempt to correct that information, upon written request.

While the University strives to protect against the loss, misuse, and alteration of the information under our control, through security measures which we consider reasonable and appropriate, it cannot guarantee, or warrant, the security of the information. When a visitor chooses to use the sites, he or she does so at his or her own risk.

Information which is disclosed by visitors to the sites in certain forums that are intended for public use (for example, information, including personal information that is provided to others on bulletin boards, through blogs, or in chat rooms, or social media that may be available on the sites) can be collected and used by other visitors to the sites.

4. Changes to this Policy

The University reserves the right to make changes to this Policy and/or the Online Privacy Statement, as needed, and in accordance with the University's general policies. If you have any queries about this Policy, or that you believe your personal information has been released without your consent, please contact the Registrar's Office.

The University is an Institution of Higher Education that is involved in education, research, and community development. In order for UPNG to educate its students in face-to-face, blended, and online learning, it engages in world-class research, and provides community services. Therefore, it is essential, and necessary, that the University has lawful bases to collect, process, use, and maintain the data of its students, employees, applicants, research subjects, and others who are involved in its educational, research, and community programs. These lawful bases include, without limitation, admission, registration, delivery of classroom, online, and overseas education, grades, communications, employment, applied research, development, program analysis for improvements, and records retention. Examples of data that UPNG may need to collect in connection with the lawful bases are: names, email addresses, IP addresses, physical addresses or other location identifiers, photographs, as well as some sensitive personal data which are obtained with prior consent.

Most of UPNG's collection and processing of personal data fall under the following categories:

1. Processing is essential for the purposes of the legitimate interests pursued by UPNG or Third Parties in providing education, employment, research and development, and community programs.
2. Processing is essential for the performance of a contract to which the data partner is party or in order to take steps at the request of the data subject prior to entering into a contract. This lawful basis pertains primarily, but not exclusively to, research contracts.
3. Processing is essential for compliance with a legal obligation to which UPNG is subject.
4. The data partner has given consent to the processing of his or her personal data for one or more specific purposes. This lawful basis pertains primarily, but not exclusively to, the protection of research subjects, which provide medical and mental health services.

There will be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

5. Types of Personal Data Collected, and Why

The University collects a variety of personal and sensitive data to meet one of its lawful bases, as already referenced. Most often, the data are used for academic admissions, enrolment, educational programs, job hiring, the provision of medical services, and participation in research, development, and community outreach. Data typically include names, addresses, transcripts, work histories, information for the payroll, research subject information, medical and health information (for student health services, or travel), and donations. If you have specific queries regarding the collection and use of your personal data, please contact the Registrar's Office.

If a data partner refuses to provide personal data that is required by UPNG in connection with one of the University's lawful bases which enforces it to collect such personal data, such refusal may make it impossible for the University to provide education, employment, research, or other requested services.

6. Where Does the UPNG Obtain Personal and Sensitive Personal Data?

The University receives personal and sensitive personal data from multiple sources. Most often, the University obtains these data directly from the data partner or under the direction of the data partner who has provided it to a Third-Party (for example, application for admission to the University through the use of its Online Application facility).

7. Individual Rights of the Data Partner under the Laws of Papua New Guinea.

Individual data partners that are covered by the Laws of Papua New Guinea will be afforded the following rights:

7.1 Information about the controller who is collecting the data.

7.2 The data protection officer's contact information.

7.3 The purposes and legal basis/legitimate interests of the data collection/processing.

7.4 Recipients of the personal data.

- 7.5 If the University intends to transfer personal data to another country or international organization.
- 7.6 The period for which the personal data will be stored.
- 7.7 The existence of the right to access, rectify incorrect data, or erase personal data, restrict or object to processing, and the right to data portability.
- 7.8 The existence of the right to withdraw consent at any time.
- 7.9 The right to lodge a complaint with a supervisory authority (ICT).
- 7.10 Why the personal data are required, and possible consequences of the failure to provide the data.
- 7.11 The existence of automated decision making, including profiling.
- 7.12 If the collected data are going to be further processed for a purpose other than that for which it was collected.

Note: The exercising of these rights is a guarantee to be afforded a process, and not the guarantee of an outcome.

Any data partner who wishes to exercise any of the above mentioned rights may do so by filing such a request with the Registrar's Office.

8 Cookies

"Cookies" are files that many websites transfer to users' web - browsers to enable the site to deliver personalised services, or to provide persistent authentication. The information contained in a "cookie" typically includes information collected automatically by the web server and/or information provided voluntarily by the user. Our Website may or may not use persistent "cookies" in conjunction with a Third-Party technology partner to analyse search engine usage and web-traffic patterns. This information is used in the aggregate to monitor and enhance our web-pages. It is not used to track the usage patterns of individual users.

The UPNG will not share your information with Third Parties except in these instances:

1. As necessary, to meet one of its lawful purposes, including, but not limited to,
 - its legitimate interest;
 - contract compliance;
 - pursuant to consent provided by users;

- as required by law; and
- 2. As necessary to protect the University's interests;
- 3. With service providers who are acting on our behalf, and who have agreed to protect the confidentiality of the data.