



# QuantumIT Solutions

## InPlace Privacy Notice

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Brought to you by

**QuantumIT**

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## Introduction

The purpose of this Privacy Notice is to inform users (“User”) of the InPlace product how the owners, QuantumIT, process personal data.

InPlace is an online platform used to help students find work placements. QuantumIT works primarily with Higher Education Institutes (“HEIs”) and Placement Providers (“Agencies”) for the benefit of Students. Any personal data processed about Users is with this goal in mind.

QuantumIT has a contract with the HEI that dictates how QuantumIT can process data for Students, HEI Staff, and Agency Staff. In this case, the Data Controller is the HEI, and QuantumIT is the Data Processor. As such, the HEI is responsible for collecting consent (if deemed by them to be the most applicable form of Lawful Processing), and providing Users (Data Subject) with a detailed Privacy Notice of their intentions for the data they collect from the User.

QuantumIT provide this Privacy Notice as an *accompanying* reference for transparency only. As a first point of call, QuantumIT always recommend referring to the HEI Privacy Notice. For a more detailed breakdown of what data InPlace uses and how, please see the User’s applicable section under Header 0.

As defined by the GDPR, processing may include, but is not limited to, storing, organising, retrieving, using, modifying, sharing, restricting, and erasing the User’s personal data. User information is accessible to other Staff & Agency Users in InPlace who have all agreed to the HEIs Privacy Notice in order to access their account. Within the contract with the HEI, InPlace is responsible for facilitating the following sets of operations:

- User registration and creation,
- Student Allocation,
- Placement Management,
- Student Professional Registration,
- InSight Surveys and Campaigns,
- Cost Management,
- HEI and Agency Agreement,
- Data maintenance and security.

Throughout these operations, QuantumIT's partners have prioritised protecting the interests of the InPlace Users. Consequently, QuantumIT endeavours to use personal data in a way that will benefit the data subject as outlined in the agreement between the HEI and QuantumIT.

## Collecting Personal Information

Depending on the user type, the HEI will provide InPlace with a variety of personal data. Please note any information provided within InPlace will be stored for at least as long as the account is active (Users have certain rights around personal data, as described in section 0).

For a breakdown of the information QuantumIT processes, please see the relevant section. Not all of these points will apply to all users, though the reasons for collecting this information are for these processes only.

### Student

- *Personal information and Contact details, including address coordinates* – this is to allow HEI and Agency Staff members to view a Student's profile, and allow them to contact a Student for placement opportunities. Student address coordinates can be used by the HEI to determine the distance from/commute time to a work placement. Additionally, the address coordinates will be used if the Student chooses to take part in the carpooling functionality to map paths between other nearby students.
- *Right-to-work Documentation and Licenses* – when matching students for best fit with possible placements, the HEI takes into consideration the Student's eligibility for a role. Students are never automatically allocated to placement roles: based on rule-based recommendations an HEI member of staff will manually allocate students to placement opportunities. Examples of right-to-work documentation and licenses might include: police checks, working with children, driving license and immunisation records, amongst others.
- *HEI Enrolment (unit & course), Scholarships, Schedule, and Work Preferences* – based on the Student's unit, course, schedule and work preferences, different opportunities will be presented to them within InPlace. Additionally, for certain courses, the HEI will enrol Students onto placements periodically. Allocation decisions for these courses rests solely with the HEI Staff members responsible, but they can use the information stored in InPlace to take Student preferences into account.
- *Placement Requirements, Compatibility, Specialisations, Rotations, History, and Comments* – where students have mandatory requirements for their placements, the HEI

uses InPlace to record how many of those conditions the Student has met, and how many the Student still needs to undertake. This is visible to both the Student and the HEI, where applicable. The HEI can also see information about Student (in)compatibility with Agencies, specialisations Students have accrued, shifts Students have been assigned to and comments about a Student's placements inputted by the Student, Agency Personnel, or HEI Staff.

- *Surveys, Opportunities and other Campaigns* – InPlace allows for the surveying of HEI Staff, Agency Staff and Students. As a result, the Student's involvement in these surveys, opportunities or campaigns will be processed by the HEI for statistical and research purposes.

## HEI and Agency Staff

- *Personal details* – This is important for building up the network Staff and Personnel have access to, between other staff members and Agency Personnel.
- *Staff Faculty, Disciplines, Offered Courses, and Campus access* – this information is used by an HEI to determine which students staff members can supervise, what courses are available to students and the placement requirements of each course.
- *Agency Staff contact details, work address, and agency disciplines* – this information is used by HEI Staff to facilitate contact when placements have been offered, accepted and for monitoring students whilst on placement.
- *Surveys, Opportunities and other Campaigns* – InPlace allows HEIs to survey HEI Staff, Agency Staff and Students. As a result, User involvement in these surveys, opportunities or campaigns will be processed by the HEI for statistical and research purposes.

## Use of Personal Information

InPlace does not use automated decision making for allocations, students, placements or any other purpose. The allocation process is specific to HEIs, who normally setup some rule-based matching criteria that ranks students' suitability to a role. The HEI is responsible for allocating all students to work placements.

In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, the HEI will be obliged to disclose personal information to the requesting law enforcement agency.

QuantumIT is contractually obligated to aid them in doing so. The HEI will need to ensure the

request is legitimate, seeking assistance from the board and from their legal advisers where necessary.

## Transfers of data outside the EEA

QuantumIT will only action a Transfer of Data outside the EEA (according to GDPR) in the following manner:

- people/entities outside the EEA being able to access or "see" personal data held in the EEA;

Whilst personal data will normally be processed and held in the same region as the HEI/Agency (E.g. UK based University will have all their related information stored in the UK) in the event of a software, database or other similar data-related issue, QuantumIT may need to grant remote access to the HEI database to their head office (Melbourne, Australia) or other development teams both inside and outside the EEA. Where possible, the issue will be recreated in an instance where no personal data is held.

Where this is not possible, access will be restricted to a need-only basis, and will be revoked as soon as the issue has been resolved. No copies of any data will be made or otherwise transferred elsewhere. Personal information will continue to be protected to the same standard as always, and data subjects will continue to have the same rights over their personal data as they would under normal circumstances.

The HEI may also ask QuantumIT to transfer student data to medical boards, government agencies or other organisations. When transferring data, QuantumIT always ensures that all security requirements are met in order to protect the data subject throughout the transfer process. These, and all other transfers, will only ever take place under direct instruction from their HEI partners, or when within the scope of InPlace's contract with the HEI.

Finally, any user that is created for an EEA based HEI or Agency will have access to InPlace Networks regardless of their geographic location. As such, if a user were to login to InPlace Networks from outside the EEA, they would be able to see the same data as if they had logged in from within the EEA (effectively carrying out a Transfer of Data outside the EU). QuantumIT cannot take any responsibility for the actions of users that are not employed by QuantumIT.

## Cookie Policy

InPlace uses cookies to allow Users to open a session after successfully authenticating their profile and to validate their access. Once the User logs out, these cookies expire and will be permanently removed from the browser when it is next closed. Here's a list of the cookies InPlace use (for the Staff only) and their purpose:

Name	Origin	Purpose	Mandatory
.AspNetCore.Antiforgery.<UniqueID>	Login Page 4.0+	Confirms that idsrv.session is not a forgery. This cookie prevents someone else from carrying out actions in InPlace whilst pretending to be a User.	Yes
idsrv	Login Page 4.0+	Opens a Forms Session (Microsoft compatibility).	Yes
idsrv.session	Login Page 4.0+	Initiates the session that grants a user access to InPlace.	Yes
inplacehome	Login Page 4.0+	Login Page uses cookie to redirect to correct page. Is then deleted.	Yes
.AspNet.Cookies	InPlace Home 4.0+	Opens a Forms Session (Microsoft compatibility).	Yes
ASP.NET_SessionId	InPlace Home 4.0+	Initiates the session that grants a user access to InPlace.	Yes
__RequestVerificationToken	InPlace Home 4.0+	Confirms that ASP.NET_SessionId is not a forgery. This cookie prevents someone else from carrying out actions in InPlace whilst pretending to be the User.	Yes
.ASPXAUTH	InPlace Home 3.6+	Opens a Forms Session (Microsoft compatibility).	Yes
ASP.NET_SessionId	InPlace Home 3.6+	Initiates the session that grants a user access to InPlace.	Yes
__RequestVerificationToken_<Uniqueid>	InPlace Home 3.6+	Confirms that ASP.NET_SessionId is not a forgery. This cookie prevents someone else from carrying out actions in InPlace whilst pretending to be the User.	Yes

Please note that no personal information is kept within these cookies. They contain randomly generated strings that grant a User tokenized access to the InPlace product. QuantumIT are working to move all their products away from using cookies, which is why cookies aren't used in newer interfaces, such as the Student and Academic user interfaces.

## Retention policy of data

QuantumIT supply a standard Data Retention Policy as part of a Software as a Service provision.

By default, InPlace removes all inactive student personal data after a 10 year period.

The Data Controller's Retention Policy supersedes QuantumIT's, in which case please refer to the Data Controller's Privacy Notice for the retention period.

## Security policy of data

QuantumIT's Security Policy covers the following areas:

- Access control
- Network and Server security
- Application and Database security
- Cloud Services security
- Data Transfer security
- Penetration testing

Please contact the HEI Data Protection Officer to obtain a copy of the QuantumIT Security Policy.

## Amendment clause

QuantumIT retain the right to amend this Privacy Notice at any time. As QuantumIT inherits the Data Controller's basis for Lawfulness of Processing via its contract, it is the Data Controller's responsibility to ensure any changes in processing asked of QuantumIT fall within their chosen basis and within the confines of the agreed contract.

## User rights

In accordance with the GDPR, QuantumIT processes User information based on the Data Controller's Lawfulness of Processing. QuantumIT has inherited this from the Data Controller as a contracted data processor. If the Data Controller is using consent as this basis, the HEI will have recorded consent prior to providing QuantumIT with the User's personal data.

In this case, if a Data Subject wishes to withdraw consent, either from InPlace, or the HEI entirely, the Data Subject needs to contact the Data Controller's Data Protection Officer directly. The contact details can be found in the HEI Privacy Notice.

A user of InPlace can action the Right of Access, Right of Erasure, Right to Rectification & Right to Object by contacting the HEI Data Protection Officer. These are collectively referred to as Data Subject Action Requests (DSARs).

If a user wishes to raise a concern or complaint with a supervisory authority, QuantumIT recommends contacting the supervisory authority listed in the HEI's Privacy Notice.

Please note that QuantumIT does not have permission to respond to DSARs directly. QuantumIT can only action DSARs received from the Data Controller.

## Updating information

Whilst QuantumIT will make every effort to only process accurate information about a User, please note that it is the User's responsibility to update the information QuantumIT holds when and where there is a discrepancy. If there is any incorrect information that the User is unable to modify directly, please contact the Data Controller Administrator, or raise a DSAR as described in the User rights section.

## Contact details

Please refer to the HEI's Privacy Notice for their Data Controller contact details and supervising authority.

If a User wishes to contact QuantumIT's Data Protection Office, please contact:  
dataprocessing@quantumIT.com.au