

Privacy (DLI) Policy

Section 1 - Preamble

- (1) This Policy is effective from 17th September 2025.

Section 2 - Purpose

- (2) This purpose of this policy is to establish the principles by which DLI will recognise and respect the importance of personal data protection.

Section 3 - Scope

- (3) This Policy applies to all processing by DLI of the Personal Data of its staff, students and persons with whom DLI interacts.
- (4) During the establishment of DLI, all policy, procedures and supporting processes will be regularly reviewed. In the establishment phase, defined as the first two years from when students commence DLI programs, any issues arising from the implementation of current policy, procedure or process will be referred to a jointly-convened Policy and Procedure Review Panel (PPRP). The PPRP will comprise designated academic and professional service representatives from the University Partners and the Office of the Rector. The PPRP will recommend an outcome best aligned with relevant principles and the best interests of any student(s) concerned, and will advise DLI on the future development of policy, procedure and supporting processes. During the establishment phase, the PPRP may make recommendations to vary any given policy only with endorsement from relevant University Partner governance processes. All policy and procedure will be subject to a full review at the end of the two-year establishment phase.

Section 4 - Policy

Principles

- (5) DLI will process Personal Data lawfully, transparently, and for the purpose for which it is expressly collected or as otherwise authorised or permitted by law.
- (6) When collecting Personal Data from an individual, whether by verbal, written or electronic means, all reasonable steps must be taken to ensure that the Personal Data Subject is made aware of:
 - a) the legality of the processing of Personal Data;
 - b) the purpose of processing the Personal Data;
 - c) the type and relevance of the Personal Data to be processed;
 - d) retention period of documents containing Personal Data;
 - e) details regarding the information collected;
 - f) the period for which the Personal Data is processed; and
 - g) the rights of Personal Data Subjects.

- (7) Personal Data must be processed only to the extent necessary and relevant to DLI's functions and activities and where there is a specific and immediate need to do so.

Obligations

- (8) All staff of DLI must, in performing the duties of their employment, appointment or engagement, respect the privacy of Personal Data they process and must comply with all applicable personal data protection laws, including without limitation Law No. 27 of 2022 on Personal Data Protection of the Republic of Indonesia (**PDP Law**), this policy, and its related procedures.
- (9) DLI will take reasonable steps to ensure that the Personal Data that it holds is accurate and complete.
- (10) DLI will establish processes to enable a Personal Data Subject to exercise their rights under Chapter IV of the PDP Law.
- (11) Technical and organisational measures will be put in place to ensure that Personal Data held by DLI is:
- a) kept secure and protected from unauthorised processing, whether deliberate or inadvertent; and
 - b) subject to obligations under public record-keeping and other legislation, destroyed or permanently de-identified when it is no longer needed.

Personal Data Protection Officer

- (12) A Personal Data Protection Officer may be appointed as required under Article 53 of the PDP Law and will undertake the duties set out in that Article.

Use and Disclosure

- (13) DLI will not transfer Personal Data out of Indonesia unless:
- a) it has first ensured that the country to which the Personal Data is transferred has a level of Personal Data Protection equivalent to or higher than that provided in the PDP Law; or
 - b) it has entered into an agreement with the recipient of the Personal Data to ensure that there is adequate and binding Personal Data Protection.
- (14) DLI may share Personal Data with its University partners, which may involve a transfer of Personal Data out of Indonesia, specifically in accordance with relevant legislation in each jurisdiction.

Complaints

- (15) A Personal Data Subject is entitled to make a complaint about the processing of their Personal Data by DLI. DLI will establish a procedure for the handling of these complaints, noted in the DLI Privacy Notice, which may be forwarded to the University partners as necessary, depending on the circumstances of the complaint.

Training

- (16) DLI will establish a personal data protection training program to be provided to staff at induction and at least every two years thereafter.

Roles and Responsibilities

(17) Roles and Responsibilities:

Role	Responsibilities
Rector	Administer this policy, including monitoring compliance, informing and assisting staff on privacy issues and responding to complaints concerning potential privacy breaches
	Nominated Personal Data Protection Officer for the purposes of PDP Law.
	Receives and investigates privacy complaints.
	Decision-maker in relation to significant privacy breaches
	Ensure personal data protection training program is provided to staff at indication and every 2 years thereafter.

Section 5 - Procedure

(18) The following procedures document how to comply with this Policy:

- a) Privacy Breach Management (DLI) Procedure

Section 6 - Definitions

(19) For the purpose of this Policy:

- a) **Personal Data** means data about natural persons who are identified or can be identified separately or combined with other information either directly or indirectly through electronic or non-electronic systems.
- b) **Personal Data Subject** means a natural person to whom Personal Data is attached
- c) **Process or Processing** includes collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, and without limiting the scope of this definition processing includes storing Personal Data in a cloud-based environment, whether by way of primary storage or redundancy.

POLICY DETAIL	
Name of policy	Privacy (DLI) Policy
Legislation	Personal Data Protection Law of the Republic of Indonesia (PDP Law) Deakin University Act 2009 (Vic) Privacy Act 1988 Privacy and Data Protection Act 2014 Health Records Act 2001 - SECT 1 Public Records Act 1973 General Data Protection Regulation (EU) 2016/679 UK General Data Protection Regulation Data Protection Act 2018

Approved by	Yayasan Governing Board
Approval date	17th September 2025
Date of effect	17th September 2025
Version	1.0
Date of review	The standard is five years from effective date, although can be reviewed more frequently if required. New policies are to be reviewed within 12 months to confirm effectiveness.
DLI Approval	Yayasan Governing Board 17 th September 2025
Deakin University Approval	Vice-Chancellor Professor Iain Martin 8 th September 2025
Lancaster University Approval	Nicola Owen DCE(O) (Delegated to Michael Wykes) 8 th September 2025
Responsible Executive	Chief Operating Officer
Implementation Officer	Chief Operating Officer or nominee
Policy/procedure superseded	Interim Joint Privacy Policy
Associated documents	DLI Privacy Notice
Summary	This policy establishes the principles by which DLI will recognise and respect the importance of personal data protection.
Key words for online searching	Privacy, personal data, protection
Category	Administrative
Target audience	Students, Staff