



Thank you for visiting www.academyoftraining.edu.au.

The purpose of this online service is to provide you with trusted information from AOT.

This online service is bound by the provisions of the [Privacy Act 1988 \(Cth\)- external site](#), including the [Australian Privacy Principles- external site](#).

Privacy Policy

Academy of Training is committed to ensuring the privacy of the personal information you have provided to us as required under Federal laws regarding Privacy.

This policy outlines how AOT complies with Privacy Act 1988 and Australian Privacy Principles (APPs), specifically in the way it collects, uses, secures and discloses personal information to ensure:

- it maintains and provides a current Privacy Policy;
- information gathered for the express purpose of training and assessment matters will not be disclosed to a third party unless prior written consent is provided by the individual concerned, except that required by law and for government compliance auditing;
- the secure storage of all records;
- the confidentiality of all information maintained on records.
- Provide the Privacy Policy free of charge and in such form as appropriate, and as is reasonable.

By providing your personal information to AOT, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

Scope

From 12 March 2014, the Australian Privacy Principles (APPs) will replace the National Privacy Principles and Information Privacy Principles and will apply to organisations, and Australian Government (and Norfolk Island Government) agencies.

This policy and procedure ensures privacy of AOT employees, clients, students, contractors and stakeholders.

Definition from the Privacy Act 1988

Personal Information means “information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- i. whether the information or opinion is true or not; and
- ii. whether the information or opinion is recorded in a material form or not.

Sensitive Personal Information means “information or an opinion about an individual” that is also personal information, such as:

- i. personal contact information such as telephone or address details; or
- ii. racial or ethnic origin; or
- iii. political opinions; or
- iv. membership of a political association; or
- v. religious beliefs or affiliations; or
- vi. philosophical beliefs; or
- vii. membership of a professional or trade association; or
- viii. membership of a trade union; or
- ix. sexual orientation or practices; or
- x. criminal record.

Australian Privacy Principles and AOT Procedures

1. Open And Transparent Management Of Personal Information

AOT will take reasonable steps to implement practices, procedures and systems relating to the AOT's functions or activities as a Registered Training Organisation (RTO) as required by the Standards for Registered Training RTOs 2015 (SRTO 2015) to:

- Ensure that AOT complies with the Australian Privacy Principles and manage personal information in an open and transparent way
- Ensure that it maintains an up-to-date policy about the management of personal information.

- To deal with inquiries or complaints from individuals in a timely manner
- Provide the Privacy Policy free of charge and in such form as appropriate, and as is reasonable.

2. Anonymity and Pseudonymity

- AOT will respect that individuals may not wish to identify themselves when making enquiries on AOT products and services, however, require full personal details as required by law and for identification purposes from clients.
- If you choose not to provide your personal information to us for the purposes set out in this Privacy Policy, you may not be able to enrol in courses or receive certain products and services, and we may not be able to undertake certain activities for you, such as enrolling you in a course or providing you with requested information, products or services.

3. Collection of Solicited Personal Information

- AOT advises that it is required by law to collect, hold, use and supply personal information, in accordance with the National VET Provider Collection Data Provision Requirements.
- AOT will not collect personal information from you unless that information is necessary for one or more of its functions or activities as an RTO, or is required by law.
- The personal information collected and held about you includes but is not limited to:
 - your name, address, email address, age, gender, tax file number, citizenship, unique student identifier, occupation, contact information;
 - information about your education history and other related information if you are a student registered with us;
 - payment details, such as your credit card details;
 - details of courses undertaken with us;
 - background checks including police checks and working with children checks if you apply for employment or other related positions;
 - health and sensitive information - only if you directly provide that information to us.
 - Information about your health; or
 - Other sensitive information about you (for example, information about your racial or ethnic origin).
 - other information provided voluntarily by you, for example in response to surveys or competitions.
- We may use health information about you to ensure that any education programs in which you participate are run safely and in accordance with any special health needs you may have, for insurance purposes and otherwise as required or authorised by law..
 - In addition, we may use de-identified health information and other de-identified sensitive information to:
 - carry out research;
 - prepare submissions to government or a government body; or
 - otherwise plan events and activities.
- We collect personal information about you in a number of ways
 - Directly from you, for example, when you register your interest on line, complete and AOT Enrolment Form, request certain services or products, or otherwise contact or do business with us.
 - Provide information to us in person or by phone, email, in an application form, or competition entry form, certified documents, emails, letters sent by you.
 - Submit information through our web sites (including without limitation www.academyoftraining.edu.au)
 - From third parties, such as:
 - AOT's commercial partners;
 - social media sites such as Facebook and Twitter when you contact or otherwise engage with AOT through these social media sites; and
 - third party service providers, to provide or facilitate your enrolment at AOT
- AOT may use your personal information for the primary purpose for which it was collected and secondary purposes either related to the primary purpose, or as otherwise set out in this Privacy Policy. Such primary and secondary purposes may include, without limitation, use of your personal information to:
 - Process any application for enrolment you might submit to us;
 - Process funding eligibility and submit information to the Australian Government - Department of Education and Training;
 - Verify your identity;
 - Manage your enrolment;
 - Record and maintain your details;
 - Administering training programs;
 - Record and maintain details of your ongoing training and assessment;
 - Provide you with details regarding client services, benefits, and training opportunities;
 - Notify you about upcoming events and opportunities;

- Gain feedback from you;
- Develop student registers to enable us to communicate with you and any nominated parent/guardian;
- Process any job application you might submit to us;
- Develop, run, administer and promote competitions, programs, activities and other events run by us, including promotion on social media;
- Market and promote products, services, merchandise and special offers made available by us or our respective corporate partners;
- Administer and manage our website and provide you with access to the AOT website;
- Keep you informed of news and information relating to AOT, including by distributing newsletters, publications and other communication via various mediums including direct mail, email, SMS and MMS messages;
- If you are an employee or other representative of a customer to which we provide our products and services or a supplier or service provider to us, to communicate with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy;
- Research and develop new programs, activities and other events relating to education and other services;

4. Collection of Unsolicited Personal Information

- If AOT receives personal information that is unsolicited, AOT will determine whether or not it could have collected the information under Australian Privacy Principle 3
- If the personal information is unsolicited, AOT will, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.
- De-identified information is information which has been aggregated or otherwise anonymised so that it cannot be used to identify you or any other individual.

5. Notification of Collection of Personal Information

- Should AOT collect information about you from a third party we will take reasonable steps to ensure that the individual is or has been made aware of the matters listed above except to the extent that making the individual aware of the matters would pose a serious threat to the life or health of any individual.
- We will notify our students and stakeholders through the www.academyoftraining.edu.au or through face to face orientation and induction sessions the fact that we have collected personal information, and the circumstances of that collection.
- Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

6. Use or Disclosure of Personal Information

- AOT will not use or disclose personal or sensitive information for any purpose other than what it was collected for, unless the relevant person has provided written consent to use or disclose that information in circumstances that are different to those for which it was collected.
- The circumstances where an exception may occur are:
 - Where the use or disclosure of this information is required or authorised by or under an Australian law or a court/tribunal order;
 - The individual would reasonable expect AOT to use or disclose the information for the secondary purpose;
 - A permitted health situation exists in relation to the use or disclosure of the information by AOT;
 - A permitted general situation exists in relation to the use or disclosure of the information by AOT;
 - AOT reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- AOT will make a written note of use or disclosure if AOT uses or discloses personal information if it reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- We may disclose your personal information to:
 - If you are a school based apprentice or VET in Schools student - your school, the New South Wales and/or Queensland Curriculum and Assessment Authority and the Queensland Tertiary Admissions Centre;
 - If you are enrolled in training paid for by your employer - to your employer;
 - If you are enrolled with AOT and undertaking training with another organisation (including other training providers, community organisations, or schools) - the organisation with which you are undertaking training;
 - If you are under the age of 18 - your parent/guardian (unless you have formally advised AOT not to provide this information);
 - Government Authorities and Agencies including but not limited to the National Centre for Vocational Education, Department of Education and Training and the Australian Quality Skills Authority

- Third parties that we have engaged to carry out functions and activities on our behalf (such as other education providers, our website hosts, trade suppliers, independent contractors and other third party service providers) or that we otherwise work with to provide our education programs;
- Our commercial partners;
- Our professional advisers, including our accountants, auditors and lawyers;
- Our insurers; and
- Otherwise as required or authorised by law.
- You consent to us using your personal information in the above ways.
- We do not otherwise use or disclose your personal information without your permission, unless the disclosure is:
 - in accordance with this Privacy Policy or any agreement you enter into with us; or
 - required or authorised by law, including without limitation the Information Privacy Principles under the *Information Privacy Act 2009 (Qld)*.
- You can contact us using the contact details specified in Section 15 if you do not want to receive marketing information (such as our newsletters, publications and other communications) or use the unsubscribe option within electronic communications. However, you cannot opt out of receiving administrative messages in relation to any course in which you are currently enrolled.

7. Direct Marketing, AOT:

- May use personal information (specifically your name and relevant address details) and information about your preferences for direct marketing (ie the communication channels which you prefer for receiving direct marketing from us and the types of products and services in which you are interested in) so as to let you know about our services and benefits, where we have your consent.
- Provides an **opt-out and/or unsubscribe** method that is easily accessible for individuals to request not to receive direct marketing communications.

8. Cross Border Disclosure, AOT:

- Does not disclose personal information to overseas recipients unless prior written approval is received by the individual who the personal information relates.
- Some of your personal information may be transferred, stored, processed or used overseas by us or by third party service providers. This may happen if we outsource certain activities overseas or if transactions, information, services or products have an overseas connection. You consent to the collection, use, storage, and processing of your personal information outside of Australia.
- In particular, your personal information may be disclosed to third party service providers which may store your personal information in India, the USA, the UK, and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy, without us being responsible under the *Information Privacy Act 2009 (Qld)* for such use (or for any breach). In these circumstances, you consent to the collection, use, storage and processing of your personal information in those countries. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the *Information Privacy Act 2009 (Qld)* in relation to how those parties treat your personal information.

9. Adoption, use or disclosure of Government Related identifiers, AOT:

- Is required by law (*Student Identifier Act*) to collect, maintain and report to relevant Government agencies the individual's Unique Student Identifier (USI) number in accordance with the National VET Provider Collection Data Provision Requirements.
- Will not disclose the Unique Student Identifier (USI) number for any other purpose, including on any Certification documents you receive.
- Must not adopt the Unique Student Identifier (USI) number as its own identifier of the individual.

10. Quality of Personal Information

- We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, we rely on the accuracy of personal information was provided to us both directly and indirectly.
- If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately (our contact details are set out in Section 15 below) and we will take reasonable steps to ensure that it is corrected.

11. How we protect your Personal Information

- This online service is hosted in Australia in secure, government accredited facilities. To help protect the privacy of data and personal information we collect and hold, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis.
- We train our employees about the importance of confidentiality and maintaining the privacy and security of your information. Access to your Personal Information is restricted to employees who need it to provide benefits or services to you.
 - Protect the information from misuse, interference and loss as well as unauthorised access, modification or disclosure.
 - Destroy the information or to ensure that the information is de-identified.
- The SRTO 2015 requires all RTOs to maintain training and assessment records for 30 years.

12. Access to Personal Information

- Current AOT students have access to update their personal details. If you wish to access your information then please contact the Privacy Officer (our contact details are set out in Section 15 below). Upon verifying your identity, AOT will meet your request within a reasonable time.
 - AOT provides all clients with electronic access to their own personal records, where the individual can update and maintain their own personal information.
- In some circumstances, AOT may not permit access to individuals for their personal information. If this is ever the case, AOT will provide full details for the legal reasons for this decision. These may include that AOT believes :
 - That giving access to the information would pose a serious threat to the life, health or safety of the individual, or to public health or public safety; or
 - Giving access would have an unreasonable impact on the privacy of other individuals; or
 - The request for access is frivolous or vexatious; or
 - The information relates to existing or anticipated legal proceedings between AOT and the individual, and would not be accessible by the process of discovery in those proceedings; or
 - Giving access would reveal the intentions of AOT in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
 - Giving access would be unlawful; or
 - Denying access is required or authorised by or under an Australian law or a court/tribunal order; or
 - Both of the following apply:
 - AOT has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to AOT functions or activities has been, is being or may be engaged in;
 - Giving access would be likely to prejudice the taking of appropriate action in relation to the matters; or
 - Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - Giving access would reveal evaluative information generated within AOT in connection with a commercially sensitive decision-making process.
- When dealing with requests for access to personal information, AOT will:
 - Respond to request for access within 30 days of the request, if from an individual, and within a reasonable time, if the request is from an organisation; and
 - Provide access to the information in the manner requested, if it is reasonable and practicable to do so.
- AOT does not charge a fee for access to personal information. The exception is re-prints of certification documentation previously supplied.

13. Correction of Personal Information

- Should AOT be satisfied that personal information is inaccurate, out of date, incomplete, irrelevant or misleading, AOT will take such steps as reasonable to correct the information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.
- Should AOT refuse to correct information, AOT will give written notice to the individual that sets out:
 - The reason for refusal
 - The mechanisms available to complain about the refusal; and
 - Any other matter prescribed by the regulations.
- How we deal with complaints and requests
 - You may request access to Personal Information about you that we hold and you may ask us to correct your Personal Information if you find that it is not accurate, up-to-date or complete. You may also make a complaint about our handling of your Personal Information. These services are free of charge.
 - To protect your privacy and the privacy of others, we will need evidence of your identity before we can grant you access to information about you or change it.

- You can contact us by email, or send your request or complaint to the postal address below. We undertake to respond within 30 days. If the request or complaint will take longer to resolve, we will provide you with a date by which we expect to respond.
- We take all privacy complaints seriously and will investigate your complaint in a confidential manner. You will be informed of the outcome of the investigation within a reasonable period of time.
- From time to time, we may need to change this Privacy Policy to reflect our changing business practices. We will notify you of any amendments by posting an updated version of this Privacy Policy on the AOT website www.academyoftraining.edu.au

14. Our Website

- Cookies - To improve your experience on our site, we may use 'cookies'. Cookies are small text files that help a web site to remember your preferences and improve your experience of using that web site.
 - Using cookies is standard practice for most large web sites. In some cases, the cookies that we use may collect some personal information about you. We will treat this information in the same way as other personal information we collect about you. If you prefer, you may be able to disable cookies on your internet browser, however please note that if you do this you may not be able to use the full functionality of this website.
 - We may engage third parties, to help analyse how our website is used. This analysis is performed using data collected from the website, including the use of cookies which are stored on your computer. The information generated is used to create reports about the use of our website, and these third parties may store this information. However, this information is not intended to and will generally not include any personal information. If you would prefer that these third parties do not collect even any anonymous data about how you use our web sites, you may be able to opt-out. Please contact us using the contact details specified in section for more information.
- Our website may contain links to other websites
 - Some of the content on our website may include links to third party websites or applications made available by third parties, such as social media buttons or links that allow you to share content or links to our website through the relevant third party platforms.
 - www.academyoftraining.edu.au uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other Personal Information
 - Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.
- Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.
 - By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy- external site](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google- external site](#).

15. Contact us

Contact us about your privacy concerns.

- have any questions regarding this Privacy Policy or our Personal Information handling processes;
- would like to correct your Personal Information held by us,
- wish to make a complaint in relation to a breach of your privacy; or
- would like to opt out of direct marketing;

Alternatively, you can write to us at:

CEO, Academy of Training
119 Banksia Road,
Greenacre NSW 2190

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