



POLICY 28  
PRIVACY POLICY & PROCEDURE

Last Reviewed: October 2018

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# 1. SCOPE

Tactical Training (Australia) Pty Ltd (TTA) is committed to maintaining the privacy and confidentiality of its RTO personnel and participant records. TTA complies with the *Privacy Act 1988 including the 13 Australian Privacy Principles (APPs)* as outlined in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

As a component of our risk management practices, TTA has conducted a Privacy Impact Assessment for all operations. Mitigation actions from this risk assessment have been implemented for the management of privacy risks at each stage of the information lifecycle, including collection, use, disclosure, storage, destruction and de-identification.

Providing an overall framework for our privacy practices, TTA has developed and implemented this APP Privacy Policy.

TTA manages personal information in an open and transparent way. This is evident in the implementation of practices, procedures and system we outline in this policy, that ensure our compliance with the APPs and any binding registered APP code and provide suitable procedures for TTA personnel to be able to deal with related inquiries and complaints that may be received from time to time.

The following sections of this policy outline how we manage personal information.

## 2. AUSTRALIAN PRIVACY PRINCIPLES

### Australian Privacy Principle 1 – Open and transparent management of personal information

#### ***Purposes for information collection, retention, use and disclosure***

TTA retains a record of personal information about all individuals with whom we undertake any form of business activity. TTA must collect, hold, use and disclose information from our clients and stakeholders for a range of purposes, including but not limited to:

- Providing services to clients
- Managing employee and contractor teams
- Promoting products and services
- Conducting internal business functions and activities
- Requirements of stakeholders

As a government registered training organisation, regulated by the Australian Skills Quality Authority, TTA is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants in nationally recognised training programs. This information requirement is outlined in the *National Vocational Education and Training Regulator Act 2011* and associated legislative instruments. In particular, the legislative instruments:

- *Standards for Registered Training Organisations (RTOs) 2015*
- *Student Identifiers Act 2014*
- *Data Provision Requirements 2012*

It is noted that TTA is also bound by various State Government Acts requiring similar information collection, use and disclosure (particularly *Education Act(s)*, *Vocational Education & Training Act(s)* and *Traineeship & Apprenticeships Act(s)* relevant to state jurisdictions of TTA operations).

It is further noted that, aligned with these legislative requirements, TTA delivers services through a range of Commonwealth and State Government funding contract agreement arrangements, which also include various information collection and disclosure requirements.

Individuals are advised that due to these legal requirements, TTA discloses information held on individuals for valid purposes to a range of entities including:

- Governments (Commonwealth, State or Local)
- Australian Skills Quality Authority (ASQA) (commonwealth government)
- National Centre for Vocational Education Research (NCVER)
- Student Identifiers Register, under the Student Identifiers Act 2014 (commonwealth)
- Australian Apprenticeships Centres
- Employers (and their representatives), Job Network Providers, Schools, Guardians
- Service providers such as credit agencies and background check providers

## ***PERSONAL AND NON-PERSONAL INFORMATION***

Our Privacy Policy identifies how we treat your personal and non-personal information.

### ***Kinds of personal information collected and held***

The following types of personal information are generally collected, depending on the need for service delivery:

- Contact details
- Employment details
- Educational background
- Demographic Information
- Course progress and achievement information
- Financial billing information

The following types of sensitive information may also be collected and held:

- Identity details
- Employee details & HR information
- Complaint or issue information
- Disability status & other individual needs
- Indigenous status
- Background checks (such as National Criminal Checks or Working with Children checks)

### ***Kinds of non-personal information and how is it collected and used***

Non personal information is information that cannot identify you. If you visit the TTA website (<https://www.tacticaltraining.edu.au/>) to read information, such as information about one of our services, we may collect certain non-personal information about you from your computer's web browser. Because non-personal information cannot identify you or be tied to you in any way, there are no restrictions on the ways that we can use or share non-personal information. What is personal information and how is it collected? Personal information is information that identifies you as an individual, such as your name, mailing address, e-mail address, telephone number, and fax number. We may collect personal information from you in a variety of ways:

- When you send us an application or other form
- When you conduct a transaction with us, our affiliates, or others
- When we collect information about in you in support of a transaction, such as credit card information
- In some places on this web site you have the opportunity to send us personal information about yourself, to elect to receive particular information, to purchase access to one of our products or services, or to participate in an activity

## ***How personal information is collected***

TTA's usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as registration forms, enrolment forms or service delivery records) and the use of web-based systems (such as online enquiry forms, web portals or internal operating systems).

TTA does receive solicited and unsolicited information from third party sources in undertaking service delivery activities. This may include information from such entities as:

- Governments (Commonwealth, State or Local)
- Australian Apprenticeships Centres
- Employers (and their representatives), Job Network Providers, Schools, Guardians
- Service providers such as credit agencies and background check providers

## ***Unique Student Identifiers***

From 1<sup>st</sup> January 2015, all learners are required to provide a valid Unique Student Identifier (USI).

Learners who grant permission to TTA to create a USI on their behalf are required to provide personal identification documents that are validated through the Australian, state and territory governments', *Document Verification Service (DVS)*. Personal identification documents that are collected by TTA, only for the purpose of creating a USI, are destroyed in accordance with provisions of the Privacy Act and the Student Identifiers Act (Sections 11, 16, 17 and 23).

TTA has nominated that within in the VETtrak student management system, any identity documents that are recorded for the purpose of creating the USI, will be automatically deleted following the successful creation of the USI.

## ***How personal information is used***

TTA may keep and use personal information we collect from or about you to provide you with access to this web site or other products or services, to respond to your requests, to bill you for products/services you purchased, and to provide ongoing service and support, to contact you with information that might be of interest to you, including information about products and services of ours and of others, or ask for your opinion about our products or the products of others, for record keeping and analytical purposes and to research, develop and improve programs, products, services and content.

Personal information collected online may be combined with information you provide to us through other sources We may also remove your personal identifiers (your name, email address, social security number, etc). In this case, you would no longer be identified as a single unique individual. Once we have de-identified information, it is non-personal information and we may treat it like other non-personal information. Finally, we may use your personal information to protect our rights or property, or to protect someone's health, safety or welfare, and to comply with a law or regulation, court order or other legal process.

TTA's usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- As soon as practical converted to electronic means
- Stored in secure, password protected systems, such as financial system, learning management system and student management system
- Monitored for appropriate authorised use at all times

Only authorised personnel are provided with login information to each system, with system access limited to only those relevant to their specific role. TTA student data is managed using the VETtrak RTO student management system supported by OzSoft Solutions. Data is stored under a hosted installation, the VETtrak database is located physically on OzSoft Solutions servers within the OzSoft premises. The security of this data is under OzSoft's control and is the responsibility of OzSoft. OzSoft's privacy policies and procedures are accessible for viewing at: <http://www.ozsoft.com.au/security-and-privacy>.

Destruction of paper based records occurs as soon as practicable in every matter, through the use of secure shredding and destruction services at all TTA sites.

Individual information held across systems is linked through an identification number generated by VETtrak for each individual.

### ***Retention and Destruction of Information***

TTA maintains a *Retention and Disposal Schedule* documenting the periods for which personal information records are kept.

Specifically, for our RTO records, in the event of our organisation ceasing to operate the required personal information on record for individuals undertaking nationally recognised training with us would be transferred to the Australian Skills Quality Authority, as required by law.

### ***Accessing and seeking correction of personal information***

TTA confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact with:

Tactical Training (Australia) Pty Ltd Privacy Officer  
08 8331 1620  
[privacy@tacticaltraining.edu.au](mailto:privacy@tacticaltraining.edu.au)

A number of third parties, other than the individual, may request access to an individual's personal information. Such third parties may include employers, parents or guardians, schools, Australian Apprenticeships Centres, Governments (Commonwealth, State or Local) and various other stakeholders.

In all cases where access is requested, TTA will ensure that:

- Parties requesting access to personal information are robustly identified and vetted
- Where legally possible, the individual to whom the information relates will be contacted to confirm consent (if consent not previously provided for the matter)
- Only appropriately authorised parties, for valid purposes, will be provided access to the information

### ***Complaints about a breach of the APPs or a binding registered APP code***

If an individual feels that TTA may have breached one of the APPs or a binding registered APP *Privacy Complaints Procedure* below for further information.

### ***Likely overseas disclosures***

TTA confirms that individuals' personal information will not be disclosed to overseas recipients.

### ***Making our APP Privacy Policy available***

TTA provides our APP Privacy Policy available free of charge, with all information being publicly available from the Privacy link on our website at [www.tacticaltraining.edu.au/privacy](http://www.tacticaltraining.edu.au/privacy). This website information is designed to be accessible as per web publishing accessibility guidelines, to ensure access is available to individuals with special needs (such as individuals with a vision impairment).

In addition, this APP Privacy Policy is:

- Prominently displayed at each TTA's premises
- Included within our *Student Information*
- Noted within the text or instructions at all information collection points (such as informing individuals during a telephone call of how the policy may be accessed, in cases where information collection is occurring)
- Available for distribution free of charge on request, as soon as possible after the request is received, including in any particular format requested by the individual as is reasonably practical

If, in the unlikely event the APP Privacy Policy is not able to be provided in a particular format requested by an individual, we will explain the circumstances around this issue with the requester and seek to ensure that another appropriate method is provided.

### ***Review and Update of this APP Privacy Policy***

TTA reviews this APP Privacy Policy:

- On an ongoing basis, as suggestions or issues are raised and addressed, or as government required changes are identified
- Through our internal audit processes on at least an annual basis
- As a part of any external audit of our operations that may be conducted by various government agencies as a part of our registration as an RTO or in normal business activities
- As a component of each and every complaint investigation process where the complaint is related to a privacy matter

Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, meetings, training and documentation, and externally through publishing of the policy on TTA's website and other relevant documentation (such as our Student Handbook) for clients.

## **Australian Privacy Principle 2 – Anonymity and pseudonymity**

TTA provides individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general course enquiries or other situations in which an individual's information is not required to complete a request.

Individuals may deal with us by using a name, term or descriptor that is different to the individual's actual name wherever possible. This includes using generic email addresses that does not contain an individual's actual name, or generic user names when individuals may access a public component of our website or enquiry forms.

TTA only stores and links pseudonyms to individual personal information in cases where this is required for service delivery (such as system login information) or once the individual's consent has been received.

Individuals are advised of their opportunity to deal anonymously or by pseudonym with us where these options are possible.

## **Requiring identification**

TTA must require and confirm identification however in service delivery to individuals for nationally recognised course programs. We are authorised by Australian law to deal only with individuals who have appropriately identified themselves. That is, it is a *Condition of Registration* for all RTOs under the *National Vocational Education and Training Regulator Act 2011* that we identify individuals and their specific individual needs on commencement of service delivery and collect and disclose Australian Vocational Education and Training Management of Information Statistical Standard (AVETMISS) data on all individuals enrolled in nationally recognised training programs. Other legal requirements, as noted earlier in this policy, also require considerable identification arrangements.

There are also other occasions also within our service delivery where an individual may not have the option of dealing anonymously or by pseudonym, as identification is practically required for us to effectively support an individual's request or need.

## **Australian Privacy Principle 3 — Collection of solicited personal information**

TTA only collects personal information that is reasonably necessary for our business activities.

We only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this policy.

All information we collect is collected only by lawful and fair means.

We only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.

## **Australian Privacy Principle 4 – Dealing with unsolicited personal information**

TTA may from time to time receive unsolicited personal information. Where this occurs we promptly review the information to decide whether or not we could have collected the information for the purpose of our business activities. Where this is the case, we may hold, use and disclose the information appropriately as per the practices outlined in this policy.

Where we could not have collected this information (by law or for a valid business purpose) we immediately destroy or de-identify the information (unless it would be unlawful to do so).

## **Australian Privacy Principle 5 – Notification of the collection of personal information**

Whenever TTA collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

- TTA's identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters
- The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party
- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection
- The purpose of collection, including any primary and secondary purposes
- The consequences for the individual if all or some personal information is not collected
- Other organisations or persons to which the information is usually disclosed, including naming those parties
- Whether we are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located
- A link to this APP Privacy Policy on our website or explain how it may be accessed
- Advice that this APP Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us; and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint

Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details or in person through questioning.

### ***Collection from third parties***

Where TTA collects personal information from another organisation, we:

1. Confirm whether the other organisation has provided the relevant notice above to the individual
2. Whether the individual was otherwise aware of these details at the time of collection
3. If this has not occurred, we will undertake this notice to ensure the individual is fully informed of the information collection

## **Australian Privacy Principle 6 – Use or disclosure of personal information**

TTA only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:

- An individual consented to a secondary use or disclosure
- An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection
- Using or disclosing the information is required or authorised by law

### ***Requirement to make a written note of use or disclosure for this secondary purpose***

If TTA uses or discloses personal information in accordance with an 'enforcement related activity' we will make a written note of the use or disclosure, including the following details:

- The date of the use or disclosure
- Details of the personal information that was used or disclosed
- The enforcement body conducting the enforcement related activity
- If the organisation used the information, how the information was used by the organisation
- The basis for our reasonable belief that we were required to disclose the information

## **Australian Privacy Principle 7 – Direct marketing**

TTA does not use or disclose the personal information that it holds about an individual for the purpose of direct marketing, unless:

- The personal information has been collected directly from an individual, and the individual would reasonably expect their personal information to be used for the purpose of direct marketing
- The personal information has been collected from a third party, or from the individual directly, but the individual does not have a reasonable expectation that their personal information will be used for the purpose of direct marketing
- We provide a simple method for the individual to request not to receive direct marketing communications (also known as ‘opting out’)

On each of our direct marketing communications, TTA provides a prominent statement that the individual may request to opt out of future communications, and how to do so.

An individual may also request us at any stage not to use or disclose their personal information for the purpose of direct marketing, or to facilitate direct marketing by other organisations. We comply with any request by an individual promptly and undertake any required actions for free.

We also, on request, notify an individual of our source of their personal information used or disclosed for the purpose of direct marketing unless it is unreasonable or impracticable to do so.

## **Australian Privacy Principle 8 – Cross-border disclosure of personal information**

TTA confirms that individuals’ personal information will not be disclosed to overseas recipients.

## **Australian Privacy Principle 9 – Adoption, use or disclosure of government related identifiers**

TTA does not adopt, use or disclose a government related identifier related to an individual except:

- In situations required by Australian law or other legal requirements
- Where reasonably necessary to verify the identity of the individual
- Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority
- As prescribed by regulations

## **Australian Privacy Principle 10 – Quality of personal information**

TTA takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. We also take reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant. This is particularly important where:

- When we initially collect the personal information
- When we use or disclose personal information

We take steps to ensure personal information is factually correct. In cases of an opinion, we ensure information takes into account competing facts and views and makes an informed assessment, providing it is clear this is an opinion. Information is confirmed up-to-date at the point in time to which the personal information relates.

Quality measures in place supporting these requirements include:

- Internal practices, procedures and systems to audit, monitor, identify and correct poor quality personal information (including training staff in these practices, procedures and systems)
- Protocols that ensure personal information is collected and recorded in a consistent format, from a primary information source when possible
- Ensuring updated or new personal information is promptly added to relevant existing records
- Providing individuals with a simple means to review and update their information on an on-going basis through our online portal
- Reminding individuals to update their personal information at critical service delivery points (such as completion) when we engage with the individual
- Contacting individuals to verify the quality of personal information where appropriate when it is about to be used or disclosed, particularly if there has been a lengthy period since collection
- Checking that a third party, from whom personal information is collected, has implemented appropriate data quality practices, procedures and systems

## **Australian Privacy Principle 11 — Security of personal information**

TTA takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.

Access to TTA offices and work areas is limited to our personnel only - visitors to our premises must be authorised by relevant personnel and are accompanied at all times. With regard to any information in a paper-based form, we maintain storage of records in an appropriately secure place to which only authorised individuals have access.

Regular staff training and information bulletins are conducted with TTA personnel on privacy issues, and how the APPs apply to our practices, procedures and systems. Training is also included in our personnel induction practices.

We conduct ongoing internal audits (at least annually and as needed) of the adequacy and currency of security and access practices, procedures and systems implemented.

## **Australian Privacy Principle 12 — Access to personal information**

Where TTA holds personal information about an individual, we provide that individual access to the information on their request. In processing requests, we:

- Ensure through confirmation of identity that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf
- Respond to a request for access:
  - Within 14 calendar days, when notifying our refusal to give access, including providing reasons for refusal in writing, and the complaint mechanisms available to the individual; or
  - Within 30 calendar days, by giving access to the personal information that is requested in the manner in which it was requested
- Provide information access free of charge

## **Australian Privacy Principle 13 – Correction of personal information**

TTA takes reasonable steps to correct personal information we hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

### ***Individual Requests***

On an individual's request, we:

- Correct personal information held
- Notify any third parties of corrections made to personal information, if this information was previously provided to these parties

In cases where we refuse to update personal information, we:

- Give a written notice to the individual, including the reasons for the refusal and the complaint mechanisms available to the individual
- Upon request by the individual whose correction request has been refused, take reasonable steps to associate a statement with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading
- Respond within 14 calendar days to these requests
- Complete all actions free of charge

### ***Correcting at TTA's initiative***

We take reasonable steps to correct personal information we hold in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.

## **3. Website and Social Media Procedure**

### ***Information collected via website and social media***

We will not share your personal information collected from the TTA web site with an unrelated third party without your permission, except as otherwise provided in this Privacy Policy. In the ordinary course of business, we may share some personal information with companies that we hire to perform services or functions on our behalf. In all cases in which we share your personal information with a third party for the purpose of providing a service to us, we will not authorize them to keep, disclose or use your information with others except for the purpose of providing the services we asked them to provide.

We will not sell, exchange or publish your personal information, except in conjunction with a corporate sale, merger, dissolution, or acquisition. For some sorts of transactions, in addition to our direct collection of information, our third party service vendors (such as credit card companies and banks) who may provide such services as credit, insurance, and escrow services may collect personal information directly from you to assist you with your transaction. We do not control how these third parties use such information.

If you submit a review for a third party (person or business) using our Facebook Fan Review Application, during the submission process we ask your permission to gather your basic information (such as name and email address) which we then share with the third party for whom you are submitting the review. We may be legally compelled to release your personal information in response to a court order, subpoena, search warrant, law or regulation.

We may cooperate with law enforcement authorities in investigating and prosecuting web site visitors who violate our rules or engage in behaviour, which is harmful to other visitors (or illegal). We may disclose your personal information to third parties if we feel that the disclosure is necessary to protect our rights or

property, protect someone's health, safety or welfare, or to comply with a law or regulation, court order or other legal process. As discussed in the section on cookies and other technologies, from time to time we may allow a third party to serve advertisements on this web site.

If you share information with the advertiser, including by clicking on their ads, this Privacy Policy does not control the advertisers use of your personal information, and you should check the privacy policies of those advertisers and/or ad services to learn about their use of cookies and other technology before linking to an ad.

### ***Use of personal information for communications***

We may contact you periodically by e-mail, mail or telephone to provide information regarding programs, products, services and content that may be of interest to you. In addition, some of the features on this web site allow you to communicate with us using an online form. If your communication requests a response from us, we may send you a response via e-mail. The e-mail response or confirmation may include your personal information. We cannot guarantee that our e-mails to you will be secure from unauthorized interception.

### ***Are cookies or other technologies used to collect personal information?***

We may use cookies and related technologies, such as web beacons, to collect information on our web site. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you register with us, a cookie helps TTA to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same TTA website, the information you previously provided can be retrieved, so you can easily use the features that you customized. A web beacon is a small graphic image that allows the party that set the web beacon to monitor and collect certain information about the viewer of the web page, web-based document or e-mail message, such as the type of browser requesting the web beacon, the IP address of the computer that the web beacon is sent to and the time the web beacon was viewed. Web beacons can be very small and invisible to the user, but, in general, any electronic image viewed as part of a web page or e-mail, including HTML based content, can act as a web beacon. We may use web beacons to count visitors to the web pages on the web site or to monitor how our users navigate the web site, and we may include web beacons in e-mail messages in order to count how many messages sent were actually opened, acted upon or forwarded.

Third party vendors also may use cookies on our web site. For instance, we may contract with third parties who will use cookies on our web site to track and analyse anonymous usage and volume statistical information from our visitors and members. Such information is shared externally only on an anonymous, aggregated basis. These third parties use persistent cookies to help us to improve the visitor experience, to manage our site content, and to track visitor behaviour. We may also contract with a third party to send e-mail to our registered users.

To help measure and improve the effectiveness of our e-mail communications, the third party sets cookies. All data collected by this third party on behalf of TTA is used solely by or on behalf of TTA and is shared externally only on an anonymous, aggregated basis. From time to time we may allow third parties to post advertisements on our web site, and those third-party advertisements may include a cookie or web beacon served by the third party. This Privacy Policy does not cover the use of information collected from you by third party ad servers. We do not control cookies in such third party ads, and you should check the privacy policies of those advertisers and/or ad services to learn about their use of cookies and other technology before linking to an ad. We will not share your personal information with these companies, but these companies may use information about your visits to this and other web sites in order to provide advertisements on this site and other sites about goods and services that may be of interest to you, and they may share your personal information that you provide to them with others.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the TTA websites you visit.

## **Links**

The TTA website contains links to other sites that provide information that we consider to be interesting. TTA is not responsible for the privacy practices or the content of such web sites.

## **Children's privacy**

TTA will not intentionally collect any personal information (such as a child's name or email address) from children under the age of 13. If you think that we have collected personal information from a child under the age of 13, please contact us.

## **4. 'Request for Records Access' Procedure**

Individuals or third parties may at any stage request access to records held by TTA relating to their personal information. The following procedure is followed on each individual request for access:

1. A request for access is provided by the requester, with suitable information provided to be able to:
  - a. Identify the individual concerned
  - b. Confirm their identity
  - c. Identify the specific information that they are requesting access to

This request may be in any form, or preferably using TTA *Records Access or Update Request Form*.

2. Upon receiving a request for access, TTA then:
  - a. Confirms the identity of the individual or party requesting access
  - b. Confirms that this individual or party is appropriately authorised to receive the information requested
  - c. Searches the records that we possess or control to assess whether the requested *personal information* is contained in those records
  - d. Collates any personal information found ready for access to be provided

## **Confirming identity**

TTA personnel must be satisfied that a request for personal information is made by the individual concerned, or by another person who is authorised to make a request on their behalf. The minimum amount of personal information needed to establish an individual's identity is sought, which is generally an individual's name, date of birth, last known address and signature.

When meeting the requesting party in person, identification may be sighted.

If confirming details over a telephone conversation, questions regarding the individual's name, date of birth, last known address or service details may be confirmed before information is provided.

3. Once identity and access authorisation is confirmed, and personal information is collated, access is provided to the requester within 30 calendar days of receipt of the original request. We will provide access to personal information in the specific manner or format requested by the individual, wherever it is reasonable and practicable to do so, free of charge.

Where the requested format is not practical, we consult with the requester to ensure a format is provided that meets the requester's needs.

4. If the identity or authorisation access cannot be confirmed, or there is another valid reason why TTA is unable to provide the personal information, refusal to provide access to records will be provided to the requester, in writing. Our notification will include reason(s) for the refusal, and the complaint mechanisms available to the individual. Such notifications are provided to the requester within 30 calendar days of receipt of the original request.

## 5. 'Request for Records Update' Procedure

Individuals or third parties may at any stage request that their records held by TTA relating to their personal information be updated. The following procedure is followed on each individual request for records updates:

1. A request for records update is provided by the requester, with suitable information provided to be able to:
  - a. Identify the individual concerned
  - b. Confirm their identity
  - c. Identify the specific information that they are requesting be updated on their records

This request may be in any form, or preferably using TTA *Records Access or Update Request Form*.

2. Upon receiving a request for records update, TTA then:
  - a. Confirms the identity of the individual or party to whom the record relates
  - b. Searches the records that we possess or control to assess whether the requested *personal information* is contained in those records
  - c. Assesses the information already on record, and the requested update, to determine whether the requested update should proceed

### **Assessing Update**

TTA personnel assess the relevant personal information we hold, and the requested updated information, to determine which version of the information is considered accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

This may include checking information against other records held by us, or within government databases, in order to complete an assessment of the correct version of the information to be used.

3. Once identity and information assessment is confirmed, personal information is:
  - a. Updated, free of charge, within 14 calendar days of receipt of the original request
  - b. Notified to any third parties of corrections made to personal information, if this information was previously provided to these parties
4. If the identity of the individual cannot be confirmed, or there is another valid reason why TTA is unable to update the personal information, refusal to update records will be provided to the requester in writing, free of charge, within 14 calendar days.

Our notification will include the reasons for the refusal and the complaint mechanisms available to the individual.

5. Upon request by the individual whose correction request has been refused, we will also take reasonable steps to associate a 'statement' with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading. This statement will be applied, free of charge, to all personal information relevant across TTA systems within 30 calendar days of receipt of the statement request.

## 6. Privacy Complaints Procedure

If an individual feels that TTA has breached its obligations in the handling, use or disclosure of their personal information, they may raise a complaint. We encourage individuals to discuss the situation with their TTA representative in the first instance, before making a complaint.

The complaints handling process is as follows:

1. The individual should make the complaint including as much detail about the issue as possible, in writing to TTA:

Tactical Training (Australia) Pty Ltd Privacy Officer  
[privacy@tacticaltraining.edu.au](mailto:privacy@tacticaltraining.edu.au)  
Unit 3 / 190 Glynburn Road, Tranmere SA 5073

2. TTA will investigate the circumstances included in the complaint and respond to the individual as soon as possible (and within 30 calendar days) regarding its findings and actions following this investigation.
3. Should after considering this response, if the individual is still not satisfied they make escalate their complaint directly to the Information Commissioner for investigation:

Office of the Australian Information Commissioner  
<https://www.oaic.gov.au/>  
Phone: 1300 363 992

When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.

4. Alternatively, if the complaint relates to a non-privacy matter, or should individuals choose to do so, a complaint may also be lodged with the ASQA complaints handling service for complaints against RTOs:

Australian Skills Quality Authority  
<https://www.asqa.gov.au/>  
Phone: 1300 701 801

## 7. CHANGES TO POLICY

TTA reserves the right to modify this statement at any time. The current version will be posted on our website and is available upon request to Tactical Training (Australia) Pty Ltd, Privacy Officer via email to: [privacy@tacticaltraining.edu.au](mailto:privacy@tacticaltraining.edu.au).