



Privacy Statement

General

This privacy statement is made by Training Online Australia Pty Ltd, ABN 32 606 780 214, trading as *alffie*, RTO Number 41206 (**alffie**, **us** or **we**).

alffie, in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Act**), has a commitment to ensuring that all reasonable steps are taken to protect the privacy of its consumers and students. This privacy statement outlines how personal information is collected, used, disclosed, held and destroyed by us.

This statement only applies to personal information collected, used, disclosed and held by *alffie* and does not provide any advice on how data will be maintained or used by Government Agencies or other third parties that have access to this data. You are advised to contact the relevant government agency or other third party for a copy of their privacy policy.

By using *alffie*'s websites and platforms, or otherwise providing us with your personal information, you consent to *alffie* collecting, holding, using and disclosing your personal information as described in this privacy statement.

We may update this privacy statement from time to time. Any changes we may make to this privacy statement in the future will be posted on this page so please check back frequently.

In this privacy statement, **personal information** has the meaning given to it in the Act.

Collection of personal information

alffie is required to collect personal information from students and other individuals in order to:

- Conduct our business, including to our related bodies corporate and/ or associated entities;
- Process and manage enrolments;
- Provide training and assessment services and other services which *alffie* offers, including employment pathway support services;
- Provide support (including ICT support) for its courses and technology;
- Respond to queries, including queries regarding our products and services;
- Organise work placements; and
- Where applicable, comply with Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) requirements as specified by government regulators.

To the extent possible, *alffie* collects all personal information directly from the person whom the information is about. This includes personal information collected when an individual:

- Completes a personal details form or an enrolment application;
- Contacts us;
- Requests support from us; and
- Visits our website (www.alffie.com).

alffie may also collect information via an enrolment referral form, which is completed by an authorised third party such as employment/work placement service providers, employers, other registered training organisations and recruitment agents or brokers. Where services are provided on behalf of a Commonwealth and/or State Government Department, we may collect personal information from such government departments and agencies. We may also need to collect relevant personal information from other third parties with or without your direct involvement or consent, such as an employer, however this will not include sensitive information (as defined in the Act).

In some circumstances, we may need to collect additional personal information from you or collect personal information from you in a way which is not described in this privacy statement. Where this is the case, we will provide you with additional information which details the personal information we will collect from you and how we will use, hold and disclose that personal information.

Types of personal information collected

In order to provide you with training, employment and associated services, we may need to collect personal information such as your name, address, work history, demographics, USI, financial information (including credit card or bank account details), qualifications, government benefit card and employment pathway information or similar information. We may also need to collect details of any disability or health issue that may affect your ability to undertake training and/or assessment activities.

We also collect data created during your enrolment including assessment records, progress and completion information, any information collected from you through surveys or quality indicator data, information from your work placement or any other information we receive from communications with you.

When you visit our website, we may collect information such as your IP address, device type, browser type, the website you visit immediately before our website(s), location data, the pages you access on our website(s), mouse clicks, mouse movements and scrolling activity, keystroke information that you enter on our website(s) and any other technical information collected by your operating system, browser or device.

If you decline to provide your personal information, *alffie* may not be able to:

- Provide the product or service you requested (including training services); or
- Enter into a business relationship with you.

Use and disclosure of information

We will use our best efforts to ensure that the information you provide to us remains private and is used and disclosed only for the purposes for which it was collected, including the purposes specified in this privacy statement. We may also disclose your personal information:

- To employment services providers or other third-party referrers who introduce you to us for the purpose of you undertaking a training course, employment pathway program or other service offered to us, in each case to assist to achieve the objectives of the referral;
- To third party organisations who provide services to us, including hosting, data processing, website development services and other outsourced services;
- To third parties who make enquiries of us about a student's studies with *alffie*, subject to the student's consent being provided;
- To parties such as Commonwealth Department of Employment, Skills, Small and Family Business, other Government departments and regulatory bodies such as the Australian Skills Quality Authority and the Tasmanian Qualifications Authority or any similar or replacement departments or agencies, to enable us to comply with applicable laws and regulatory obligations and respond to requests from Governmental and other public authorities; and
- To the National Centre for Vocational Education Research Ltd (NCVER) as part of our disclosure and reporting obligations, as set out in the Annexure.
- Where we are required or authorised to do so by law.

Access to and correction of personal information

You can request access to, or correction of, the personal information we hold about you or to have the personal information deleted.

To make such a request, you will need to contact the Student Support department (using the details set out at the end of this privacy statement) in writing and specify the type(s) of personal information you wish to view and/or the correction(s) you require. You will be required to provide proof of identification before we can proceed with your request and, depending on the complexity of your request, we may charge a fee for processing requests for access to personal information.

In certain circumstances, we may not be able to tell you what personal information is held about you or refuse access to information requested by you. In these circumstances, we will notify you to explain why we cannot provide you with the information.

We will promptly update any personal information that is inaccurate, incomplete or out of date. If we do not agree that your information is inaccurate, incomplete or out of date, we will notify you and tell you the reason(s) why we do not agree with you. We will also tell you what you can do if you are not satisfied with our response.

Storage & security

We may store your personal information in hardcopy documents or electronically. Where applicable, storage of personal information (and the disposal of information when no longer required) is managed in accordance with the Australian Government's records management regime. We ensure this by having such security measures as:

- Storing electronic information on a secure server with restricted access; and
- Storing paper-based documents securely on our premises.

We will take reasonable steps to destroy or permanently de-identify personal information when it is no longer required for any purpose.

We take reasonable steps to ensure our information systems and files are kept secured from unauthorised access and our staff and contracted agents/ service providers have been informed of the importance we place on protecting privacy and their role in helping us to do this and are contractually bound to honour such privacy.

Resolving privacy concerns

If you would like further information about this privacy statement or if you have any concerns regarding personal information you given to us or that we have collected from others, please contact Student Support on 1300 253 343 or at support@alffie.com.

If a complaint is made, generally *alffie's* procedures, staff or quality of service associated with the collection or handling of personal information will be investigated. *alffie* will be efficient and fair when investigating and responding to information privacy complaints.

If your complaint is not satisfactorily resolved, you can contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 or enquiries@OAIC.gov.au.

Annexure

National VET Data Policy: Privacy Notice

Why we collect your personal information

As a registered training organisation (RTO), we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us. If you do not provide your personal information to us, we will not be able to enrol you as a student.

How we use your personal information

We use your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO.

How we disclose your personal information

We are required by law (under the *National Vocational Education and Training Regulator Act 2011* (Cth) (**NVETR Act**)) to disclose the personal information we collect about you to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER). The NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector.

We are also authorised by law (under the NVETR Act) to disclose your personal information to the relevant state or territory training authority.

How the NCVER and other bodies handle your personal information

The NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the NVETR Act. Your personal information may be used and disclosed by NCVER for purposes that include populating authenticated VET transcripts; administration of VET; facilitation of statistics and research relating to education, including surveys and data linkage; and understanding the VET market.

The NCVER is authorised to disclose information to the Australian Government Department of Education, Skills and Employment (DESE), Commonwealth authorities, State and Territory authorities (other than registered training organisations) that deal with matters relating to VET and VET regulators for the purposes of those bodies, including to enable:

- administration of VET, including program administration, regulation, monitoring and evaluation
- facilitation of statistics and research relating to education, including surveys and data linkage
- understanding how the VET market operates, for policy, workforce planning and consumer information.

The NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf.

The NCVER does not intend to disclose your personal information to any overseas recipients.

For more information about how the NCVER will handle your personal information please refer to the NCVER's Privacy Policy at www.ncver.edu.au/privacy.

If you would like to seek access to or correct your information, in the first instance, please contact us using the contact details listed below.

DESE is authorised by law, including the Privacy Act and the NVETR Act, to collect, use and disclose your personal information to fulfil specified functions and activities. For more information about how the DESE will handle your personal information, please refer to the DESE VET Privacy Notice at <https://www.dese.gov.au/national-vet-data/vet-privacy-notice>.

Tasmanian Students

The Office of Tasmanian Assessment, Standards & Certification (**TASC**) requires *alffie* to disclose student data to them in addition to the data that we provide to NCVER. For more information on how TASC will handle your personal information, please refer to the TASC Personal Information Protection notice at <https://www.tas.gov.au/stds/pip.htm>

Surveys

You may receive a student survey which may be run by a government department or an NCVER employee, agent, third-party contractor or another authorised agency. Please note you may opt out of the survey at the time of being contacted.

Contact information

At any time, you may contact *alffie* to:

- request access to your personal information
- correct your personal information
- make a complaint about how your personal information has been handled
- ask a question about this Privacy Notice

You can contact *alffie* by emailing us at support@alffie.com, with the subject line 'Privacy Contact.'