

# Policy and Procedure

## Privacy

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### Policy

RAISE Training is committed to safeguarding the personal information entrusted to us by our clients.



### Purpose

RAISE Training is committed to the Australian privacy legislation in the way it collects, uses, secures, and discloses personal information



### Scope

This policy applies to all staff members of RAISE Training and to any person providing services on our behalf.

## Definitions

**National Privacy Principles (NPPs)** - are ten principles contained in schedule 3 of the Privacy Act 1988 (Privacy Act) which regulate how businesses handle individuals' personal information. They cover the collection, use, disclosure, and storage of personal information. They also allow individuals to access that information, and have it corrected if it is wrong.

<https://www.oaic.gov.au/privacy/australian-privacy-principles/>

### **What kind of information do we collect?**

We normally collect client information directly from our clients. We may collect client information from other persons with their consent or as authorised by law.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a client volunteers information for an obvious purpose (for example, producing a credit card to pay a service fee when the information will be used only to process the payment).

### **How do we safeguard personal information?**

We make every reasonable effort to ensure that personal information is accurate and complete.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records, and permanently deleting electronic records.

### **How do we use and disclose personal information?**

RAISE Training will only use the personal information a client has chosen to provide us for the purpose for which they provided it.

RAISE Training will not use it for any other purpose without a client's consent.

RAISE Training will only use or disclose personal information for the purpose which was either specified or reasonably apparent at the time of collection. We may also use or disclose it for any other related purpose for which a client would reasonably expect it to be used. RAISE Training may also use a client's personal information to send marketing or promotional material to them unless they indicate to us that they do not wish to receive it.

Should third parties be given access to personal information in such a case, RAISE Training requires that our contractors are obliged to keep that personal information confidential and not to use or disclose it for any purpose other than performing services for us or on our behalf.

### **Website Privacy**

RAISE Training does not require website users or visitors to provide Personally Identifiable Information to view the content on the website or to browse the different sections of the website. RAISE Training may collect from website users or visitors who choose to use the RAISE Training on-line booking or other programs, features or services offered by RAISE Training.

Any information RAISE Training collects is collected for the primary purpose of enabling RAISE Training to provide and enhance the services offered to our users. RAISE Training does not sell or license the information collected from its websites to third parties.

RAISE Training uses Google Analytics. Google Analytics may record mouse clicks and mouse movements. RAISE Training does not use Google Analytics to collect any personally identifiable information entered in this website. We are using the information collected by Google Analytics to measure the browsing behaviours of the users of the RAISE Training website.

Clients can choose to disable the service at <https://tools.google.com/dlpage/gaoptout>

### **Client Email Addresses**

RAISE Training will record a client's email address if they send us a message by email, when they book training or if they subscribe to newsletters and other services through the RAISE Training website or social media pages. Registering for notifications may be made initially by email. A client's email address will only be used for the purpose for which they have provided it. We will not use or disclose a client's email address for any other purpose without their consent.

When a client has given RAISE Training permission to receive email communication at the times mentioned above, RAISE Training may send information on training, promotions, and communication pieces such as e-newsletters. RAISE Training will not sell, rent, or loan our contact lists or our customer's contact lists (including customer data) to any outside firms unless required specifically to perform the services that a client has requested.

The data will not be used by anyone else for any other purpose. A client has the option to unsubscribe to all email communications. Unsubscribe requests are fulfilled within 24 hours of the request being received. If a client wishes to unsubscribe from email communications, they can contact RAISE Training by phone on 0433 777 780 or send an e-mail to [glentill@raisetraining.com.au](mailto:glentill@raisetraining.com.au).

### **Access and correction**

Any client on written request may access the personal information RAISE Training has obtained and currently holds on them. To the extent possible, RAISE Training will let a client access their personal information. However, there are times where the organisation is not in position to do so (e.g. where it would be unlawful to do so). If RAISE Training denies a client access to this information, then RAISE Training will notify them of this refusal and the basis for it.

RAISE Training endeavours to ensure that personal information held is accurate, complete, and up to date.

Where a client believes that personal information held by the RAISE Training is not accurate, complete, or up to date, then they are able to advise RAISE Training and every effort will be made to correct the information.

### **Data quality**

*RAISE Training takes reasonable steps to make sure that the personal information it collects uses or discloses is accurate, complete, and up to date.*

#### *Data Security*

*We take reasonable steps to protect any client's personal information from misuse or loss, and from unauthorised access, modification, or disclosure.*