

## Privacy Policy

**Policy Number:** POL-D.025

**Responsible Officer:** Johan Pienaar (CEO)

**Date of Approval:** March 2013

**Scheduled review:** 12-monthly

**Review Expiry Date:** 30 April 2018

**Cross References:** *Privacy Act 1988; Australian Privacy Principles (APPs)*

FTA is committed to protecting the privacy of your personal information. Your personal information is information or an opinion about you that allows Flight Training Adelaide Pty Ltd (FTA) to identify you. This Privacy Policy advises you how FTA manages your personal information and how to contact them if you have any privacy concerns.

### Purpose and Scope

The purpose of this policy is to provide information about:

- a. The personal information that FTA collects
- b. How FTA handles that information
- c. How you can access your personal information or make a complaint about the handling of the information.

This policy sets out how FTA complies with the obligations under the *Privacy Act 1988* ([Privacy Act](#)). FTA are bound by the [Australian Privacy Principles](#) which regulate how agencies may collect, store, use and disclose personal information, and how individuals may access and correct information held about them.

'Personal information' is defined in the Privacy Act as:

Information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. Whether the information or opinion is true or not
- b. Whether the information or opinion is recorded in a material form or not.

The Privacy Act only applies to the collection of personal information by FTA for inclusion in a document, in an electronic or other device, or in a generally available publication.

### What personal information does FTA collect?

The types of personal information that FTA may collect are set out below:

- a. When you book a trial flight, FTA collects your contact details.
- b. Information stated on the enrolment form, including proof of identity, VSL eligibility criteria and your Unique Student Identifier.

- c. If you provide FTA with feedback about our service, we collect the personal information you provide.
- d. If you use social media to interact with FTA, we may collect your user name and any information that you allow the social media site to share.
- e. Registration details needed to attend seminars and external training.
- f. When applying for a position with FTA, we generally collect the personal information in your application. FTA may collect sensitive information relevant to the role, for example, medical information or criminal history. FTA may also obtain personal information about you from third parties, for example previous employers or nominated referees.
- g. A photograph will be taken of all staff and students for and identity card that allows you access to FTA premises.
- h. Student information will be provided in certain circumstances to the Australian Government and designated authorities and, if relevant, the Tuition Assurance Scheme and the ESOS Assurance Fund Manager. In other instances information collected on your enrolment form or during your enrolment can be disclosed without your consent where authorised or required by law.

FTA only collects personal information that is reasonably necessary for, or directly related to, one or more of its services or activities.

- a. To provide all flight training services.
- b. To handle reports of misconduct lodged with FTA, monitor compliance with the laws it administers, and identify, investigate and take enforcement action in relation to contraventions of those laws.
- c. To enable FTA to consult with stakeholders and consider and determine policy.
- d. To cooperate with foreign regulators and law enforcement agencies.
- e. To deal with and assess complaints about FTA's conduct.
- f. To manage employees, contractors and service providers.
- g. To enable users to access online tools and systems.
- h. To provide access to the FTA site.
- i. To celebrate certain milestones in your career with FTA, we may ask you to take part in other photographic opportunities for company literature.

## Your consent

FTA will assume that, unless you advise otherwise, you consent to the collection of the information that you provide to FTA (either directly or indirectly) for the use and disclosure by FTA in accordance with this Privacy Policy.

FTA will only collect sensitive information (which is a category of personal information that includes information about things like health, religion etc) from you with your consent and where it is reasonably necessary for them to provide you with its services or carry out services or activities.

## How FTA collects information

FTA collects personal information from individuals, or their authorised representatives. In some circumstances it may collect personal information about individuals from third parties. These include:

- a. Personal information collected from third parties about individuals who are the subject of reports of misconduct made to FTA.
- b. Personal information collected from third parties about individuals in the course of its compliance.
- c. Personal information collected from an airline about individuals enrolled.
- d. Information provided to FTA in the course of its registration, licensing and other statutory functions may contain personal information about individuals other documents provided, such as tender documents and curriculum vitae, may contain personal information about individuals.

The Australian privacy principles place a general obligation on agencies to inform individuals when they collect personal information about them from third parties. However, in many cases where FTA collects information from third parties, it does not inform the individuals because one of the following exceptions applies:

- a. FTA expects that the individual would have consented collecting the information.
- b. FTA are required or authorised to collect the personal information from third parties by law.
- c. It would not be reasonable for the individual to know that FTA has collected the information because, for example, it may relate to the individual's course report.

## Anonymity

The Australian privacy principles require Australian government agencies to allow individuals the option of not identifying themselves, or using a pseudonym when dealing with the agency when it is lawful and practicable to do so.

FTA generally provides individuals with the option of not identifying themselves or using a pseudonym. However, on many occasions it will not be able to do this. Examples include:

- a. FTA will need your name and address in order to confirm you have an aviation reference number, student pilot licence and aviation security identification card.
- b. FTA will require the individual to provide results from the Class 1 or 2 Medical;
- c. Course enrolment forms.
- d. Government funding entitlements.

## Consequences of not providing information

If FTA asks an individual to voluntarily provide personal information there are no punitive consequences if they do not provide any or all of the information. However, there may be other consequences, for example:

- a. They may not being able to make the most of FTA services.
- b. An application for a licence will not be able to be processed.
- c. FTA may not be able to properly investigate or resolve a report of misconduct made by the individual.
- d. FTA may issue a compulsory notice seeking the information.

### **Use of information**

FTA only uses personal information that it has collected for the purpose for which it was collected, but may disclose personal information if one of the following applies:

- a. The individual consents to FTA using, or would reasonably expect FTA to use, the information for a different purpose.
- b. FTA is required or authorised by law to use the information.
- c. FTA reasonably believes that the use or disclosure is necessary for enforcement activities.

### **Disclosure to other bodies**

The types of bodies or persons to which FTA usually discloses personal information collected include the following:

- a. Airlines
- b. Law enforcement agencies (such as the Australian Federal Police)
- c. Other government agencies (such as the Australian Taxation Office)
- d. Department of Immigration, Border Protection (DIBP)
- e. Hospitals and Health Clinics
- f. Foreign regulators
- g. Applicants under the Freedom of Information Act 1982.

### **Storage and security of information**

FTA stores personal information in both electronic IT systems as well as paper files.

FTA takes steps to protect the personal information it holds against loss, unauthorised access, use, modification or disclosure, and against other misuse. These steps include password protection and access privileges for accessing the IT systems and physical access restrictions.

When no longer required, personal information is destroyed in a secure manner after it has met the destruction date identified in the quality management system.

### **Visiting FTA's website**

When you browse FTA's website, the service provider logs the following information for statistical purposes: your server address, top level domain name (e.g. .com, .gov, .au, .uk), the date and time of your visit, the pages accessed, documents downloaded, the previous site visited and the type of browser used.

FTA does not identify users or their browsing activities except in the event of an investigation where a law enforcement agency may be entitled to inspect the service provider's logs.

From time to time FTA may use cookies on its website to help them carry out online surveys. Cookies are small pieces of information exchanged between your web browser and a website server. Where it uses an external survey provider, that provider could use cookies on their website. If this is the case you will be directed to information on the provider's website explaining the use of cookies.

### **Access and correction**

The Privacy Act allows individuals to seek access to and request correction of records containing their personal information. The *Freedom of Information Act 1982* also sets out the process by which you can access, change or annotate records held by FTA, which contain your personal information.

You can obtain further information about how to request access or changes to the information by contacting FTA's marketing department whose contact details are set out below:

M. Wallis, Manager Business Development  
Hangar 54, Kittyhawk Lane  
Parafield Airport SA 5108  
Phone: 08 8282 2811

### **Complaints**

Complaints about breaches of the Australian Privacy Principles by FTA may be made to the Manager Quality and Compliance and may be contacted on 08 8209 4386 or email [lpinaar@flyfta.com](mailto:lpinaar@flyfta.com).

### **Review**

The policy will be reviewed every 12 months or more often due to legislation or circumstantial change.



Johan Pinaar  
(Chief Executive Officer/Director)