

RAAus Policy Privacy

1. Rationale

The privacy of Members is of utmost importance to Recreational Aviation Australia (RAAus).

RAAus understands that members may have concerns about their privacy and the confidentiality and security of information that RAAus may collect from time to time.

RAAus, while not required to, chooses to apply the principles of the [Privacy Act 1988](#) (the Privacy Act). The Privacy Act was amended by the [Privacy Amendment \(Enhancing Privacy Protection\) Act 2012](#) (Privacy Amendment Act). The Privacy Amendment Act introduced many significant changes to the Privacy Act which commenced on 12 March 2014. One of the changes included consolidating the Information Privacy Principles (IPPs) and National Privacy Principles (NPPs) into one unified set of Australian Privacy Principles (APPs) applicable to both Australian government agencies and organisations.

RAAus is committed to respecting your right to privacy and protecting your personal information in accordance with the Privacy Act and our policies and procedures.

This Policy will be reviewed and updated periodically to take into account any new laws or technology, and/or changes to RAAus' functions, operations and practices (APP 1.3).

2. Definitions

CEO	The person occupying the position of Chief Executive Officer.
Board	RAAus' governing body, elected from the membership.
Policy	A statement about what* is to occur in relation to the operations of RAAus, which has the corporate authority of the board or, by delegation, the CEO. * Policy statements are not normally concerned with how the policy will be implemented—this is a matter of processes, procedures and guidelines as used by those responsible for implementing the policy.
RAAus	Recreational Aviation Australia Ltd
RAAus Office	The address of Unit 3, 1 Pirie Street, Fyshwick, Australian Capital Territory

3. Scope and Application

This Privacy Policy sets out how we manage personal information across our organisation. It also applies to your use of any RAAus websites, mobile applications and platform, and any third party information which may be collected by us.

4. Policy Statement

4.1. Types of personal information we collect and hold

In this policy, personal information has the same meaning as defined in Section 6 of the Privacy Act:

- a. **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.

The types of personal information we collect and hold will vary depending on your Membership, your dealings with RAAus and, services and benefits we (or our agents, contractors and third parties) provide to you, or a request or inquiry you make in relation to the services.

Some examples of personal information include names, addresses, gender, contact telephone numbers, email addresses, date of birth, banking details, licence and registration numbers, or photographs. It may also include indirectly identifying information, such as the description of an event, where the identities of any persons involved in the event are apparent even though no names are used. Whether or not the description of the event contains personal information may depend on the context and who is reading the information.

4.1.1. Solicited personal information

RAAus only collects personal information that is reasonably necessary for, or directly related to the functions or activities of the RAAus (APP 3.1). The types of personal information that we generally collect and hold will include:

- Personal contact details
- Personnel/employee records including educational or professional qualifications
- Credit card application records
- Information in delegations
- Staff conflict of interest declarations
- Information in ministerial correspondence
- Freedom of Information applications
- Details of persons who attended RAAus training courses
- Mailing and subscription lists
- Contract, tender and submission documents
- Financial payment records
- Records for legal proceedings
- Complaint and feedback information
- Investigation records including witness statements, flight crew licences, training and qualification details, investigator's notes and interview reports
- Records of notifications of accidents and incidents
- Next of kin contact details, and
- Age, health status and medical records supply by the member.

4.1.2. Sensitive information

Personal information that is 'sensitive information' is defined by section 6 of the Privacy Act to include information or opinion about:

- an individual's racial or ethnic origin
- political opinions and association
- religious beliefs or affiliations
- philosophical beliefs
- sexual preferences or practices
- trade or professional associations (memberships and union membership)
- criminal record
- health or genetic information, and
- biometric information.

Sensitive information is afforded a higher level of protection under the Privacy Act, including limited circumstances in which it can be collected. RAAus does not normally have a need to collect the majority of the sensitive information referred to in the definition. For the purpose of fulfilling its statutory functions, RAAus may collect and hold sensitive personal information, including:

- medical reports
- physical and psychological profiles of persons involved in an occurrence, and
- criminal records.

4.1.3. Other information

We may also collect information from you that is not personal information because it does not identify you personally. This information is normally retained with your personal information and may include:

- your shopping preferences and a list of products you have purchased from RAAus. This may include your shopping history, product types, specifications, sizes, dimensions, colours, or other attributes of products and services we have provided to you or may provide to you in the future.
- information we require to deliver, service or fulfil warranty obligations for products or services.
- your marketing preferences, including the type of marketing materials you wish to receive and the method of delivery (email, SMS, direct mail, or other).
- if you are a member of RAAus, your membership number and, transaction history.
- device identification information when you use a computer, mobile phone, smart phone, tablet.
- information collected via our secure payment processing systems. This may include a unique card identification number to identify you as a repeat customer.

4.2. Why RAAus collects and holds personal information

4.2.1. Aircraft and Membership

Personal information is collected by RAAus for the primary purpose of Membership requirements, services and benefits to Members relating to their Aircraft and Membership needs.

We also collect personal information to assist in identifying ways in which we can serve you better, such as providing our products and services to you more effectively, and to assist our internal administration and operations including accounting, risk management, record keeping, archiving, systems development and testing, and staff training.

Some of the information we collect is for the purpose of improving our interaction with Members and their involvement with RAAus.

We collect personal information about third parties, including family members, for purposes of contacting in the case of an emergency for the purposes set out in this Privacy Policy.

Failure to provide the information sought by RAAus for the purposes detailed may not enable the company to complete the membership process or any specific service requested.

4.2.2. Sales, events, products

We collect your personal information for the purpose of being able to sell and promote our products to you (Purpose). In addition we collect your personal information so that we can carry out the following actions:

- to provide you with products and services that you have requested from us
- to communicate with you, including about products and services, competition results, special offers, and events which might interest you
- to answer your questions and provide you with information or advice
- to interact with you via social media and digital marketing
- to create orders, transaction records, agreements for the sale of products or services, accounts, tax invoices or receipts
- provide your personal information to third parties that assist us in providing products and services you have requested, such as delivery service providers and fulfilment managers and staff
- carry out administration, marketing, planning, fraud and loss prevention activities, procurement, product and service development, quality control and research to improve the way RAAus and its related bodies corporate and service providers provide products and services to you
- to consider and respond to complaints made by you
- to comply with laws or regulations or to comply with any directions given by regulators or authorities.

4.2.3. If we are unable to collect your personal information

If we are unable to collect your personal information, some or all of the following may occur:

- we may be unable to provide products or services to you, to the requested standard or at all
- we may be unable to communicate with you to provide information about products and services that you have purchased from us, or may intend to purchase in the future
- we may be unable to tailor the content of our marketing communications to suit your preferences
- your experience when interacting with us may be delayed or not as efficient as you may expect.

4.3. How we collect your personal information

Normally we collect information from you directly, unless it is unreasonable or impracticable to do so. Collection of your personal information can occur through the following interactions:

- when you register with us by creating an account, or subscribe to our marketing programs
- when you access and use our website, or interact with us via social media or digital media
- when you provide information to our team members
- when you complete purchase orders, registrations, requests or applications for our products or services (by phone, in person or electronically)
- when you communicate with us directly (by email, telephone, direct mail or any other means)
- when you interact with us during promotions, competitions, special events, or by using devices within our office.

5. Security

We use industry standard security measures to safeguard and protect your information. This includes taking reasonable steps to ensure your personal information is protected from misuse, loss, unauthorised access, modification or disclosure.

5.1. How we hold your personal information

We may hold your personal information in either electronic or hard copy form.

If you provide information to us electronically we retain this information in our computer systems and databases. This includes computer software programs, internet servers, and hosted internet solutions provided by third parties.

If you provide information to us in hard copy (paper) this information is normally retained in our files and a copy is made to our electronic files.

5.2. Storage and protection of personal information

RAAus stores all personal information securely and restricts access to a limited number of staff that need access in order to perform their duties or assist individuals. Most personal information held by RAAus is stored electronically such as on databases, shared drives or in emails, or on hard copy files.

RAAus takes all reasonable steps to ensure that personal information is protected from misuse, loss and interference.

When information is no longer required it is securely destroyed in accordance with the *Archives Act 1983* and relevant disposal authorities.

5.3. Use and disclosure of personal information

RAAus will only use and/or disclose personal information for the purposes for which it was collected (the primary purpose), unless an individual has consented to another use [APP 6].

There are certain limited circumstances in which RAAus may use or disclose information for a different purpose (a secondary purpose) without consent, such as where the secondary purpose is:

- directly related to the primary purpose for which the information was collected
- required or authorised under an Australian law or has been ordered by a court or tribunal
- necessary to lessen or prevent an immediate and serious threat to the life, safety of air navigation, health or safety of any individual, or public health or safety
- to facilitate the investigation of an occurrence involving an RAAus registered aircraft and the death or serious injury of one or more persons
- a permitted general situation or health situation, as defined by the Privacy Act
- an enforcement related activity and the use or disclosure of the information is reasonably necessary or
- for the purposes of collecting fees associated with airport use and access.

If RAAus uses or discloses personal information for a purpose other than what it was originally collected for, RAAus will keep a written notice of that use or disclosure as required by the APPs.

5.4. Overseas disclosure

RAAus *does not* routinely disclose personal information to overseas recipients. However, there may be occasions related to RAAus' safety investigation function where this is necessary. In some circumstances there may be parties overseas who are connected with the occurrence of the accident in which case there may need to be a cross border flow of information. In these cases RAAus complies with APP 8, including seeking to provide assurances that the information will be protected in accordance with the APPs.

5.5. Access to personal information

Under APP 12, individuals may make a request to access personal information held by RAAus. RAAus will process the request and provide access to the information within 30 days after the request is made. If RAAus decides not to grant access to the information, a written statement of reasons will be provided.

This mechanism operates alongside the [Freedom of Information Act 1982](#) (the FOI Act) under which an individual may request access to personal information held by RAAus.

To assist RAAus in locating any information held more quickly, an individual is encouraged to provide as much information as possible, such as, dealings they have had with RAAus.

6. Dealing with RAAus anonymously

The identity of an individual is typically relevant and necessary in order to achieve RAAus' purpose for collecting, using, holding or disclosing personal information. It is therefore unlikely to be practicable for RAAus to deal with individuals who have not identified themselves or who have used a pseudonym. If an individual is concerned about not being able to deal with RAAus anonymously, they may contact the Admin Manager and discuss the circumstances.

7. Direct marketing

We collect personal information so that we can provide our members with useful and relevant information about our service and products.

Generally, RAAus collects this information directly from you. In some circumstances, however, we may collect personal information from third parties, including from our service providers and social media platforms such as Facebook. We use the information we, or our service providers, collect to

assist us to determine how we can best engage with our members about our service and products. To this end, we, or our service providers, may collect information about your social media preferences and activities so that we can engage with our members on social media sites. At times, we use tools that enable us to identify the online sources of the telephone enquiries that we receive. The information we collect through these tools includes the time and date of the call, the geographical location of the call, the telephone number of the caller (unless withheld), and the IP address of the device the caller used to arrive at your website. The collection of this information helps us to determine the effectiveness of our marketing campaigns by identifying whether the calls we receive were generated by Google AdWords click throughs, or by Facebook ad click throughs (for example).

If we do not collect information in the ways described above, we may not be able to let you know about our products and services in the most effective way.

We may use and disclose the information we collect for the purpose of providing you with tailored marketing communications about our goods and services, or to conduct market research. Typically, we send these communications to your email address or mailing address. Occasionally, we may also send marketing communications to your social media accounts, including, for example, your Facebook account as well as a text message to your mobile phone

7.1. Website cookies and digital services

Information is also generated and collected whenever a page is accessed on our website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance. Some parts of our websites also use "cookies". A "cookie" is a small text file that is placed on your computer's hard drive by a web page server. Cookies store information about the use of our website and are used to identify new or previous visitors to the website and what pages have been accessed. Most web browsers are set to accept cookies, but this function can usually be disabled if you wish. Please note that if you do disable this, not all functionality on our websites will be available to you.

We also use Google Analytics features on our website, which uses both first party and third party cookies to record standard internet traffic information. We, and some third parties (including Google), also use the information to optimise ad selection for groups of individuals based on age, gender, interests and past visits to our site. The cookies allow us and other third parties (including Google) to evaluate your interactions with ad services on our site and serve targeted advertising on sites across the Internet. We have enabled Google Analytics for Display Advertising, which allows Google and other third parties to advertise to you on our site and across the Internet.

We also use (along with third parties including Google) first party cookies (such as Google Analytic cookies) and third party cookies (such as the DoubleClick cookie) to report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our website. In addition, we use data from Google's Interest-based advertising or third party audience data (such as age, gender, and interests) with Google Analytics to help us understand how user activity varies based on these factors.

Importantly, we do not combine the anonymous information collected through Google Analytics with personally identifiable information.

In addition to Google Analytics, we use a range of web analytics tools to help us understand consumer behaviour and use of our website. In particular, these tools enable us to deliver cookies,

count visits and understand usage and campaign effectiveness. This data helps us to stay connected and relevant to our Members and customers.

If you do not wish to receive any cookies you may set your browser to refuse cookies. However, this will mean that we will not be able to personalise your website each time you visit.

8. Making a privacy complaint to the RAAus

An individual may complain about the way RAAus has handled their personal information. Complaints should be in writing and sent to the CEO Office using the contact details provided ceo@raa.asn.au

The complaint should provide sufficient detail so the issues and concerns can be investigated. Notification of an outcome will be provided as soon as possible and individuals will be kept up-to-date as to the progress of their complaint.

9. Legislation

RAAus applies the principles of the [Privacy Act 1988](#) (the Privacy Act).

10. Code of Professional Conduct

All RAAus employees have the responsibility to understand, implement and conform to the RAAus Code of Professional Conduct as it relates to the Privacy Policy.

11. Breaches of this Policy

Breaches of the policy and procedures may result in disciplinary action being taken, up to and including dismissal.

12. Responsibilities

Policy Approval:	CEO
Implementation:	CEO
Review:	Administration and Financial Manager
Improvement:	CEO and Administration and Financial Manager

13. Review Schedule

This policy will be reviewed every two years.

14. Lapse Date

This policy does not have a lapse date.

15. Meta Data

ID	POL-2017-20
Version	2.0
Version date	1 August 2018
Type	Management
Approval date	1 August 2018
Availability	All staff, Board, members on our website
Keywords	Privacy, security, data, information, cookies, principles, data, storage
Responsible officer	Corporate Services Executive
History	<p>V1.0 This is the first time this policy has been reviewed. It combines the RAAus online shop and digital policy with our member and aircraft privacy policy to avoid confusion and acts as a single point of reference for all RAAus privacy elated maters.</p> <p>V2.0 issued 1 August amended section 5.3 by adding “for the purposes of collecting fees associated with airport use and access.”</p>
Review date	August 2019
Related documents	RAAus Staff Code of Professional Conduct
Contact	Recreational Aviation Australia Ltd PO BOX 1265

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