



FINANCIAL TRAINING AUSTRALIA

HOW WE HANDLE PERSONAL INFORMATION

Privacy Policy

For the organisations we partner with, the people who take part in our programs, and everyone else we deal with.



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Owner	Privacy Officer, Financial Training Australia

Privacy at a glance

This summary sets out the key points of our Privacy Policy. Please read the full policy for the detail.

The short version

- **Who we are:** Financial Training Australia (**FTA, we, us, our**) designs and delivers financial and commercial acumen training, mostly for Australian organisations and their people.
- **What we collect:** mainly business contact details, program participation and assessment information, and the information you give us when you enquire, register, attend, or work with us.
- **Why:** to design, deliver and evaluate training, to report agreed outcomes to the organisation that engaged us, to run our business, and (with an easy opt-out) to tell you about our programs.
- **Who we share it with:** the organisation sponsoring your training, our facilitators and trusted service providers, and partners who support delivery. We never sell personal information.
- **Overseas:** some service providers store information outside Australia. We take reasonable steps to make sure they protect it in line with Australian law.
- **Automated decisions:** our learning platform automatically marks some assessments and records completion. Section 11 explains this.
- **Your rights:** you can ask to access or correct your information, opt out of marketing, or make a complaint, and you can escalate to the Office of the Australian Information Commissioner (OAIC).
- **Contact:** our Privacy Officer at info@financialtrainingaustralia.com.

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1. About this policy

Evolucian Pty Ltd trading as Financial Training Australia ABN 66 643 509 497 is committed to protecting the privacy of the personal information we handle. This Privacy Policy explains how we collect, hold, use and disclose personal information, and how you can access or correct it or make a complaint.

We handle personal information in accordance with the **Privacy Act 1988 (Cth) (Privacy Act)**, including the **Australian Privacy Principles (APPs)**, as amended by the Privacy and Other Legislation Amendment Act 2024. We also comply with the **Spam Act 2003 (Cth)** and the **Do Not Call Register Act 2006 (Cth)** when we communicate with you.

Where we provide services to government agencies or other organisations under contract, we may also be bound by additional privacy obligations in that contract, including obligations that reflect Commonwealth, state or territory privacy laws (for example, the Privacy and Data Protection Act 2014 (Vic) for Victorian public sector clients). Where those obligations are stricter than this policy, we follow them for that engagement.

Who this policy applies to

This policy applies to personal information about:

- contacts at our client organisations, including decision makers in Finance, HR and Learning and Development;
- participants in our programs, workshops, eLearning modules and assessments (**learners**);
- prospective clients, event attendees, newsletter subscribers and visitors to our website and learning platforms;
- facilitators, contractors, suppliers, licensing and methodology partners; and
- job applicants.

The Privacy Act exempts certain acts and practices relating to the employee records of current and former employees. Our handling of employee records is covered by internal policies, although we apply the same security standards to them.

2. Key terms

Term	What it means
Personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.
Sensitive information	A special category of personal information that includes health information (including disability and dietary or accessibility needs linked to health), racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal record, membership of a professional or trade association or trade union, and biometric information.
Sponsoring organisation	The employer or other organisation that engages FTA to train its people, and that usually nominates learners and pays for the program.
Learning platform	Our learning management system (LMS), eLearning modules and related online tools used to deliver, track and assess training.

3. The personal information we collect and hold

The kinds of personal information we collect depend on how you deal with us. We only collect information that is reasonably necessary for our functions and activities.

If you are...	We may collect...
A client contact	Name, job title, organisation, business email, phone and address; contract, billing and purchase order details; communications with us; feedback and testimonials (only published with your permission).
A learner	Name, employer, role, business unit, work email and phone; manager or cost centre details provided by your organisation; registration and attendance records; pre-program diagnostics and learning needs; activity, progress, assessment responses, scores and completion status; certificates issued; evaluation and feedback responses; photographs or recordings of sessions (only with notice and, where required, consent); dietary or accessibility requirements you choose to provide.
A prospect, subscriber or event attendee	Name, contact details, organisation and role; marketing preferences; event registrations; how you interact with our emails and website.
A facilitator, contractor, supplier or partner	Name, business and contact details, ABN, qualifications and experience, bank details for payment, insurance and compliance documents, and performance feedback.
A job applicant	Information in your application and CV, referee details and comments, interview notes and, where relevant to the role and with your consent, background or qualification checks.
A website or platform user	IP address, device and browser information, log-in credentials, pages visited, session times and cookie identifiers (see section 10).

Sensitive information

We do not generally need sensitive information. We only collect it with your consent and where it is reasonably necessary, or where the law otherwise permits. The most common example is health-related information you give us so we can cater for dietary needs or make reasonable adjustments for accessibility. We use it only for that purpose and share it only with those who need it (for example, a venue or caterer).

Please do not include sensitive information in assessment responses, case-study exercises or feedback unless it is needed.

4. How we collect personal information

Where reasonable and practicable, we collect personal information directly from you, for example when you:

- enquire about, register for or attend a program, webinar or event;
- use our learning platform, complete activities or assessments, or provide feedback;
- communicate with us by email, phone, video conference, social media or in person;
- subscribe to our updates or download resources from our website; or
- apply to work with us or provide services to us.

Because most of our programs are delivered for organisations, we often collect learners' information **from the sponsoring organisation**, such as participant lists, roles and business units. We may also collect information from licensing and methodology partners, event co-hosts, referees, and publicly available sources such as company websites and professional networking profiles.

If we collect personal information about you from someone else, we take reasonable steps to make sure you are made aware of the matters in this policy. Sponsoring organisations agree to tell their people that their information will be provided to FTA for training purposes.

Anonymity and pseudonymity

You can deal with us anonymously or using a pseudonym where it is lawful and practicable, for example when making a general enquiry or completing an anonymous evaluation survey. It is usually not practicable to enrol in a program, complete assessments or receive a certificate without identifying yourself.

Unsolicited information

If we receive personal information we did not ask for, we will decide within a reasonable time whether we could have collected it under the APPs. If not, we will destroy or de-identify it where lawful and reasonable to do so.

If you do not provide information

If you do not provide information we request, we may not be able to enrol you, deliver training, track your progress, issue a certificate, respond to your enquiry or engage you as a supplier.

5. Why we collect, hold, use and disclose it

We collect, hold, use and disclose personal information for the following purposes:

- designing, customising and delivering training programs, including diagnosing learning needs and tailoring content to an organisation's systems and challenges;
- administering enrolments, attendance, learning platform accounts, assessments and certificates;
- reporting agreed participation, progress and outcomes to the sponsoring organisation;
- evaluating and improving our programs, facilitation and learning platform (we use de-identified or aggregated data wherever we can);
- managing client relationships, contracts, invoicing and payments;
- engaging and managing facilitators, contractors and suppliers;
- direct marketing to business contacts about our programs, events and insights (see section 9);
- recruiting staff and contractors;
- maintaining the security and integrity of our systems; and
- complying with our legal obligations and managing legal claims.

We will only use or disclose personal information for a secondary purpose if you have consented, if you would reasonably expect it and the purpose is related (or, for sensitive information, directly related) to the primary purpose, or if the Privacy Act otherwise permits it.

6. Training delivered for organisations

Most of our learners take part in programs arranged and paid for by their employer. This affects how we handle information:

- **Reporting to your organisation.** We will share attendance, completion, progress and assessment results with the sponsoring organisation as agreed in our contract with them. Where we can, we report at an aggregated level. Individual responses in confidential exercises, reflections or evaluation surveys are not shared in an identifiable form unless we have told you beforehand.
- **Your organisation's own obligations.** Once your organisation receives information from us, its own privacy policy governs how it handles that information.
- **Client-provided data.** Organisations sometimes give us business data to make case studies realistic. We ask clients to remove or de-identify personal information before sharing it, and we use any personal information we do receive only for that program.
- **Contract terms prevail.** Where a client contract contains specific privacy, confidentiality or data-handling terms, we comply with those terms for that engagement.

7. Who we disclose personal information to

We may disclose personal information to:

- the sponsoring organisation, as described in section 6;
- our facilitators, instructional designers and contractors who help us design and deliver programs;
- licensing and methodology partners whose materials, simulations or platforms we use to deliver a program, including members of the international Bonanza network;
- service providers who support our business, such as learning platform, cloud hosting, email, video conferencing, survey, CRM, accounting, payment and IT support providers;
- venues, caterers and event partners (limited to what they need, for example names and dietary requirements);
- our professional advisers, insurers and auditors;
- related entities within our corporate group, where needed to provide or administer services; and
- regulators, courts, law enforcement or other parties where required or authorised by law.

We require our service providers and partners to handle personal information only for the purposes we engage them for and to protect it appropriately. **We do not sell, rent or trade personal information.**

8. Disclosure outside Australia

Some of our service providers and partners store or access personal information outside Australia. Countries where personal information is likely to be disclosed or stored include the United States, the United Kingdom and member countries of the European Union.

Before disclosing personal information overseas, we take reasonable steps to make sure the recipient handles it in a way that is consistent with the APPs, usually through contractual terms and by assessing the provider's security and privacy practices. Where an overseas recipient is subject to a law or binding scheme that provides substantially similar protection to the APPs, and you can access mechanisms to enforce that protection, we may rely on that instead. Where a client contract requires data to be held in Australia, we comply with that requirement.

9. Direct marketing

We may use business contact details to send you information about our programs, events, resources and insights that we think will be relevant to your role. We do this in line with the APPs and the Spam Act 2003, which means:

- we send commercial electronic messages only with your express or inferred consent;

- every message identifies FTA and includes a functional unsubscribe option;
- we action unsubscribe requests within five business days, and we will not charge you to opt out; and
- we do not use sensitive information for direct marketing, and we do not sell our contact lists.

You can opt out at any time by using the unsubscribe link, replying to the message, or contacting our Privacy Officer. If you ask, we will tell you where we obtained your information. Opting out of marketing will not stop service messages about a program you are enrolled in.

10. Our website, cookies and analytics

Our website and learning platform use cookies and similar technologies to keep you logged in, remember your preferences, keep the services secure, and understand how they are used so we can improve them. We may use analytics tools, such as Google Analytics, that collect information about your device and browsing activity. Where practicable, we configure these tools to limit or de-identify the data collected.

Most browsers let you refuse or delete cookies. If you disable essential cookies, parts of our website or learning platform may not work properly.

Our website may link to third-party websites and social media platforms. We are not responsible for their privacy practices, and we encourage you to read their privacy policies.

11. Automated decisions and artificial intelligence

From 10 December 2026, the Privacy Act requires organisations to explain in their privacy policy when they use computer programs, using personal information, to make or substantially assist in making decisions that could reasonably be expected to significantly affect an individual's rights or interests. We have included this information so you understand how our learning platform and tools work.

	Details
Kinds of personal information used	Learner identity and account details; enrolment, role and business unit; activity and progress data; assessment responses and scores; completion dates.
Decisions made solely by a computer program	Automatically marking objective assessment items (such as multiple-choice questions) and determining a pass or fail result against a set threshold; recording a module or program as complete; generating completion certificates; and triggering automated reminders and progress reports to learners and, where agreed, to the sponsoring organisation.
Decisions where a computer program substantially assists a person	Recommending learning pathways or content based on pre-program diagnostic results; and using software tools (which may include AI-assisted tools) to help facilitators review written assessment responses. In these cases a member of our team reviews the output and makes the final decision.

If you think an automated result is wrong (for example, an assessment mark or completion status), contact us and a member of our team will review it. Some details of how our systems work may be withheld where they are commercially confidential.

Use of AI tools

We may use artificial intelligence tools to support content development and business administration. We do not enter personal information or confidential client information into publicly available generative AI tools. Where we use AI tools that process personal information, we assess the provider's privacy and security practices first, handle the information in line with this policy, and keep human oversight of outputs.

12. How we protect personal information

We take reasonable steps, including technical and organisational measures, to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. These include:

- role-based access to systems, so people only see the information they need;
- multi-factor authentication, strong password requirements and encryption of data in transit and, where supported, at rest;
- using reputable cloud and platform providers and reviewing their security commitments;
- confidentiality obligations in contracts with staff, facilitators and service providers;
- privacy and security awareness for our team, and secure handling of printed workshop materials; and
- regular review of our security practices and incident response arrangements.

No method of transmission or storage is completely secure, but we work to keep our safeguards appropriate to the sensitivity of the information we hold.

13. How long we keep personal information

We keep personal information only for as long as we need it for the purposes described in this policy, or as required by law. As a guide:

Type of record	Typical retention
Training, attendance and completion records	Up to 7 years after program completion, so we can verify completion for learners and sponsoring organisations, unless a client contract specifies otherwise.
Financial, tax and contract records	At least 5 to 7 years, as required by tax and corporations laws.
Marketing contacts	Until you unsubscribe or the details are no longer current. We keep a record of unsubscribes so we can honour them.
Unsuccessful job applications	12 months, unless you ask us to keep them longer or delete them sooner.
Dietary and accessibility information	Deleted after the relevant program or event, unless you ask us to keep it for future programs.

When we no longer need personal information, we take reasonable steps to securely destroy or de-identify it.

14. Data breaches

We have a data breach response plan. If we suspect a data breach, we act quickly to contain it and assess whether it is likely to result in serious harm to any individual. We aim to complete that assessment within 30 days. If it is an eligible data breach under the Notifiable Data Breaches scheme, we will notify affected individuals and the OAIC as soon as practicable. Where a breach involves information a client organisation provided to us, we will also notify that organisation in line with our contract.

15. Accessing and correcting your information

You may ask to access the personal information we hold about you, or ask us to correct it if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading. To make a request, contact our Privacy Officer (section 18). We will need to verify your identity.

- We will respond to your request within a reasonable time, usually within 30 days.
- We do not charge for making a request. If providing access involves significant cost, we may charge a reasonable fee, and we will tell you in advance.
- If we refuse access or correction, we will tell you why in writing (unless that would be unreasonable) and explain how to complain. If we refuse a correction, you can ask us to attach a statement to the record noting that you believe it is incorrect.

If your organisation enrolled you in a program, you may also be able to update some details through your organisation or directly in the learning platform.

16. Making a complaint

If you have concerns about how we have handled your personal information, or think we have breached the APPs, please contact our Privacy Officer in writing with details of your concern. We will:

1. acknowledge your complaint, usually within 5 business days;
2. investigate it fairly, and contact you if we need more information; and
3. give you a written response setting out our findings and any action we will take, usually within 30 days.

If you are not satisfied with our response, you can complain to the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner (OAIC)

- Website: www.oaic.gov.au (online complaint form available)
- Phone: 1300 363 992
- Post: GPO Box 5288, Sydney NSW 2001

The OAIC usually expects you to raise your complaint with us first and give us a reasonable opportunity to respond.

17. Changes to this policy

We review this policy at least once a year and whenever our practices or the law change. Australian privacy law is being reformed, and we will update this policy as new obligations take effect. The current version is always available on our website at www.financialtrainingaustralia.com/privacy, and you can request a free copy in another form by contacting us.

18. Contact us

For privacy questions, requests or complaints, or to obtain a copy of this policy, please contact:

Privacy Officer — Financial Training Australia

- Name: Khai Phan
- Email: info@financialtrainingaustralia.com
- Phone: +61 478 455 557
- Post: Level 1, 66 King St, Sydney NSW 2000