

**RAA Group**

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## Privacy Policy

### Your privacy is important to us

The RAA Drive School Privacy Policy below outlines how we collect, use, store and disclose personal information about you as well as RAA Drive School's general philosophy in relation to privacy. Please refer to the Credit Reporting Policy section for information on our management of your credit information.

#### Statement

RAA Drive School [ABN 90 020 001 807] is committed to protecting the privacy of individuals. RAA Drive School abides by the Australian Privacy Principles ("APPs") under the Privacy Act 1988 (Cth). The APPs regulate the way that certain entities handle personal information.

Privacy of your personal information is important to us and we conduct our business with the highest standards of personal and corporate integrity. We aim to provide the best possible service, whilst ensuring you are aware of how your personal information is used within RAA Drive School. By providing your personal information to us, you agree to our collection, use and disclosure of your personal information (including sensitive information such as health information) in accordance with this Privacy Policy.

#### What is personal information?

Personal information is 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; and (b) whether the information or opinion is recorded in a material form or not.

#### What personal information do we collect and hold?

We will always be open and honest in our dealings with you and will only collect information about you that we believe is necessary to undertake our legitimate business activities. The nature of the personal information we collect will be dependent upon your chosen level of interaction with RAA Drive School, and the degree to which you utilise the broad range of our benefits, products and services. Generally, the personal information is comprised of your

name, address, date of birth, vehicle details and telephone, and email contact details. Further specific details may be required for different types of transactions. RAA Drive School also retains transactional histories of your usage of our services for audit purposes and to assist in understanding your circumstances, preferences and service needs.

### **Why is the information collected and how is it used?**

Generally, we collect information necessary to validate your identity and to ensure your request or enquiry can be actioned efficiently and effectively. Collection of personal information is necessary to undertake the services offered by RAA Drive School.

### **How do we hold your personal information?**

We may hold your personal information in a number of ways, including;

- On our computer systems and database; This may include storing your data on a third party supplier's system;
- In hard copies (paper files); and
- As telephone recordings.

We may combine personal information we receive about you with other information we hold about you. This includes information collected for different products and services. We may hold your personal information as long as we need it for any purpose for which we may use or disclose it, or longer if required by law.

### **Telephone call recording**

We may record incoming and/or outgoing telephone calls for training, quality assurance or verification purposes. Where we have recorded a telephone call, we can provide you with a copy of the recording at your request, where it is reasonable to do so.

### **Why is the information collected and how is it used?**

Generally, we collect personal information necessary to validate your identity and to ensure your request or enquiry can be actioned efficiently and effectively. Collection of personal information is necessary to undertake a broad range of transactions offered by the RAA Drive School, including:

- to process an application for a product or service;
- to service and administer the product or service;
- to respond to any query sent to us by you;
- to handle complaints and disputes
- to use in accordance with any other purpose which is stated to you at the time of collection or that you otherwise authorise;
- to train our employees;
- to satisfy legal requirements.

## **How do we collect your personal information?**

In most cases we only collect information about you directly from you either in person, in writing, email, through our online services and by telephone. However, there are circumstances where this is impractical. In some circumstances, we may also collect your personal information from:

- third parties who you have asked to provide your personal information to us
- credit reporting bodies.

Unless we are required or permitted by law to collect sensitive information about you, we will only do so after obtaining your consent. If you provide personal information about a third party individual to us you need to ensure that the individual is aware of, understands and agrees to the collection, use and disclosure of his or her personal information in accordance with this Privacy Policy.

## **Use of cookies**

RAA Drive School uses Google Adwords and Google Analytics to collect visitor information. This allows RAA Drive School to (collect information about the traffic on its websites and) advertise online to visitors to our site. One of the primary methods used by Google Analytics is the placement of cookies. Cookies are small information files that an end user's web browser places on that user's computer when a website is visited.

These cookies do not collect any personally identifiable information or allow RAA Drive School to use personally identifiable information with other remarketing lists or cookies. Visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Preferences Manager or Google Analytics opt-out browser add-on.

## **What if you don't want to provide certain personal information?**

RAA Drive School only collects information that we believe is necessary to undertake a specific transaction or function. Therefore, refusal to supply requested details may delay or prevent us from satisfying your request.

## **Disclosure of personal information**

Any personal information collected, held or used by RAA Drive School is kept strictly confidential and is only accessed by authorised RAA Drive School staff, agents, contractors, third parties or service providers in the course of them undertaking their legitimate duties in providing a given product or service and managing our business. Only information necessary for the particular function is shared with the relevant service provider.

Customer information will not be given, rented, sold or traded to any external third party organisation and will only be made available to a third party:

- where RAA Drive School has contracted an external service provider to assist in the execution of RAA Drive School legitimate activities;
- RAA Drive School is acting as an agent or representative of another entity;
- if disclosure is required by or authorised by law; or
- if you consent to the disclosure of specific information to third parties.

## **Disclosing your personal information overseas**

RAA Drive School may need to disclose your personal information to other companies and service providers including related entities which may be located overseas. Sometimes our suppliers, contractors or agents are based overseas, or otherwise have data storage facilities overseas where your personal information will be stored. We may transfer information about you between countries if required for a relevant purpose described above.

The countries in which these recipients may be located will vary from time to time, but may include United Kingdom, United States and other countries from which entities provide services for RAA Drive School.

When disclosing your personal information to overseas recipients, we take all measures that are reasonable in the circumstances to ensure your personal information is treated in accordance with the APPs. Any information disclosed to an overseas recipient may only be used for the purposes intended.

## **How we protect your personal information**

Reasonable steps are taken by us to protect personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

## **Contacting RAA Drive School about access to and/or correction of your personal information**

RAA Drive School aims to ensure the personal information it collects, uses and discloses, including the personal information of its customers, is accurate, up to date, complete and relevant. If you would like to access your personal information or feel that the information we currently have on record is inaccurate, irrelevant, out of date or incomplete, please contact us on **8202 4444**. We will need to verify your identity before giving you access. We will normally be able to deal with your request immediately. If the request is complex, we will ask you to complete a Personal Information Access and Disclosure request form.

We will comply with any such request except where the Privacy Act 1988 or Australian Privacy Principles allow us to refuse to do so. There is no fee for making such a request, but we may charge for actually providing you access. We will endeavour to respond to such a request within 14 days.

## **Marketing and promotional offers**

From time to time RAA Drive School may contact you with some direct offers that may be of interest to you. However, RAA Drive School honours any request not to receive unsolicited, personally targeted promotional material. If you do not want to receive these offers from us, please email us on **[drivereducation@raa.com.au](mailto:drivereducation@raa.com.au)**, or by telephone on 8202 4444.

## Comments and complaints regarding privacy

If you have a problem with how RAA Drive School has used your personal information, or are concerned about any aspects of the RAA Drive School Privacy Policy, we want to hear from you. The RAA Drive School Privacy Officer has the appropriate knowledge and authority to deal with any privacy matter, and will be able to explain your rights and any referral that may be necessary in order to resolve the matter. Any formal privacy complaint will be dealt with by the Privacy Officer, or if necessary, may be referred to an Internal Dispute Resolution Team, which has the appropriate authority to deal with disputes. Privacy related comments and complaints may be lodged over the telephone, email or mailed directly to the Privacy Officer. Details as follows:

Telephone: **8202 4444** (8am – 5pm AEST weekdays)

Mail: The Privacy Officer  
101 Richmond Road  
Mile End SA 5031

Email: **privacy@raa.com.au**

The matter will be investigated and a response will be provided promptly. Any formal dispute review will be undertaken promptly, and the Internal Committee's decision will be provided within fifteen (15) working days. Every effort will be made to equitably address privacy concerns. In the unlikely event that your complaint is unresolved, you are unhappy with the resolution of your complaint or with the way RAA Drive School has handled your complaint through the Dispute Resolution Process, you are entitled to contact the Office of the Australian Information Commissioner or Financial Ombudsman which may investigate your complaint further. However, they will only become involved when all internal avenues have been exhausted. Contact details are as follows:

### Financial Ombudsman Service Limited

GPO BOX 3, Melbourne VIC 3001  
1300 78 08 08 [www.fos.org.au](http://www.fos.org.au)

### Office of the Australian Information Commissioner

GPO Box 5218, Sydney NSW 2001  
1300 363 992 [www.oaic.gov.au](http://www.oaic.gov.au)

### Changes to this Privacy Policy

This Privacy Policy may change from time to time, so please check back periodically to ensure you are aware of the terms of our current Privacy Policy.