

# Horizon Airways - Privacy Policy

HORIZON AIRWAYS takes the privacy of students and clients seriously and complies with all legislative requirements. These include the Privacy Act 1988 and the Australian Privacy Principles (APPs).

Information is only shared with external agencies such as CASA to meet our compliance requirements as a registered flight training and charter organisation. All information is kept in the strictest confidence.

HORIZON AIRWAYS is committed to maintaining the privacy and confidentiality of its personnel and student / client records and complies with the *Privacy Act 1988 including the 13 Australian Privacy Principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.*

HORIZON AIRWAYS manages personal information in an open and transparent way. This is evident in the implementation of practices, procedures and systems we outline in this policy, that ensure our compliance with the APPs and provide suitable procedures for HORIZON AIRWAYS personnel to be able to deal with related inquiries and complaints that may be received from time to time.

## **Australian Privacy Principle 1 – Open and transparent management of personal information** *Purposes for information collection, retention, use and disclosure*

HORIZON AIRWAYS retains a record of personal information about all individuals with whom we undertake any form of business activity.

### *Kinds of personal information collected and held*

The following types of personal information are generally collected, depending on the need for service delivery:

- Contact details;
- Educational background;
- Demographic Information;
- Training progress and achievement information; and
- Financial billing information.

### *How personal information is collected*

HORIZON AIRWAYS' usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as enrolment forms) and the use of web based systems (such as online enquiry forms).

### *How personal information is held*

HORIZON AIRWAYS' usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- Stored in secure, password protected systems, such as financial system, learning managementsystem and student management system;

- Hard copies are stored in locked filing cabinets; and
- Monitored for appropriate authorised use at all times.

Only authorised personnel are provided with login information or keys to each system, with system access limited to only those relevant to their specific role.

#### *Retention and Destruction of Information*

HORIZON AIRWAYS retains information for periods as required.

#### *Accessing and seeking correction of personal information*

HORIZON AIRWAYS confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact with:

HORIZON AIRWAYS

07 4957 2446

[admin@horizonairways.com](mailto:admin@horizonairways.com)

#### *Complaints about a breach of the APPs or a binding registered APP code*

If an individual feels that HORIZON AIRWAYS may have breached one of the APPs or abiding registered APP Privacy Complaints Procedure below for further information.

#### *Making our APP Privacy Policy available*

HORIZON AIRWAYS provides our APP Privacy Policy available free of charge, with all information being publicly available. In addition, this APP Privacy Policy is:

- Accessible at HORIZON AIRWAYS premises.

#### *Review and Update of this APP Privacy Policy*

HORIZON AIRWAYS reviews this APP Privacy Policy:

- On an ongoing basis, as suggestions or issues are raised and addressed, or as government required changes are identified;
- Through our internal audit processes on at least an annual basis;
- As a part of any external audit of our operations that may be conducted by various government agencies as a part of our registration as a registered flight training and charter organisation; and
- As a component of each and every complaint investigation process where the complaint is related to a privacy matter.

Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, training and documentation, and externally through publishing of the policy on HORIZON AIRWAYS website.

#### **Australian Privacy Principle 2 – Anonymity and pseudonymity**

HORIZON AIRWAYS provides individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general training or charter enquiries or other situations in which an individual's information is not required to

complete a request.

#### *Requiring identification*

HORIZON AIRWAYS must require and confirm identification however in service delivery to individuals for flight training and charter.

#### **Australian Privacy Principle 3 – Collection of solicited personal information**

HORIZON AIRWAYS only collects personal information that is reasonably necessary for our business activities. We only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this policy.

#### **Australian Privacy Principle 4 – Dealing with unsolicited personal information**

HORIZON AIRWAYS may from time to time receive unsolicited personal information. Where this occurs we promptly review the information to decide whether or not we could have collected the information for the purpose of our business activities. Where this is the case, we may hold, use and disclose the information appropriately as per the practices outlined in this policy.

Where we could not have collected this information (by law or for a valid business purpose) we immediately destroy or de-identify the information (unless it would be unlawful to do so).

#### **Australian Privacy Principle 5 – Notification of the collection of personal information**

Whenever HORIZON AIRWAYS collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

- HORIZON AIRWAYS' identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters;
- The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party;
- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection;
- The purpose of collection, including any primary and secondary purposes;
- The consequences for the individual if all or some personal information is not collected; and
- Other organisations or persons to which the information is usually disclosed, including naming those parties.

Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations or in person through questioning.

#### **Australian Privacy Principle 6 – Use or disclosure of personal information**

HORIZON AIRWAYS only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected or disclosing the

information is required or authorised by law.

#### **Australian Privacy Principle 7 – Direct marketing**

HORIZON AIRWAYS does not disclose the personal information that it holds about an individual for the purpose of direct marketing.

#### **Australian Privacy Principle 8 – Cross-border disclosure of personal information**

HORIZON AIRWAYS does not disclose the personal information that it holds about an individual for the purpose of cross-border disclosure.

#### **Australian Privacy Principle 9 – Adoption, use or disclosure of government related identifiers**

HORIZON AIRWAYS does not adopt, use or disclose a government related identifier related to an individual except:

- In situations required by Australian law or other legal requirements;
- Where reasonably necessary to verify the identity of the individual;
- Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority;
- As prescribed by regulations.

#### **Australian Privacy Principle 10 – Quality of personal information**

HORIZON AIRWAYS takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. We also take reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.

This is particularly important where:

- When we initially collect the personal information; and
- When we use or disclose personal information.

#### **Australian Privacy Principle 11 – Security of personal information**

HORIZON AIRWAYS takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.

Access to HORIZON AIRWAYS' offices and work areas is limited to our personnel only - visitors to our premises must be authorised by relevant personnel and are accompanied at all times. With regard to any information in a paper based form, we maintain storage of records in an appropriately secure place to which only authorised individuals have access.

Regular staff training is conducted with HORIZON AIRWAYS personnel on privacy issues, and how the APPs apply to our practices, procedures and systems. Training is also included in our personnel induction practices.

We conduct ongoing internal audits (at least annually and as needed) of the adequacy and

currency of security and access practices, procedures and systems implemented.

### **Australian Privacy Principle 12 — Access to personal information**

Where HORIZON AIRWAYS holds personal information about an individual, we provide that individual access to the information on their request.

In processing requests, we:

- You may access your records where necessary at any time. If you wish to access your records you must first contact the office administrator to obtain permission.
- You will be required to provide sufficient evidence of identification (preferably a driver's licence or ASIC) before the office administrator will grant you access to your records.
- No other parties will have access to your records without your prior written permission.
- You will need to provide the details of the third party seeking to access your records and the third party will have to provide suitable identification prior to any records being released.

### **Australian Privacy Principle 13 – Correction of personal information**

HORIZON AIRWAYS takes reasonable steps to correct personal information we hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

#### *Individual Requests*

On an individual's request, we:

- Correct personal information held; and
- Notify any third parties of corrections made to personal information, if this information was previously provided to these parties.

#### *Correcting at HORIZON AIRWAYS' initiative*

We take reasonable steps to correct personal information we hold in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.