

# ATOL PRIVACY POLICY (V11)

The privacy of your information is important to us. This privacy policy tells you how we use personal information collected at this site. Please read this privacy policy before using the site or submitting any personal information.

By using the Auditor Training Online (ATOL) site, you are accepting the practices described in this privacy policy. These practices may be changed, but any changes will be posted, and changes will only apply to activities and information going forward, not on a retroactive basis.

You are encouraged to review the privacy policy whenever you visit the site to make sure that you understand how any personal information you provide will be used.

*Note: The privacy practices outlined in this privacy policy are for this website only. If you link to other websites from [auditortrainingonline.com](http://auditortrainingonline.com), please review the privacy policies posted at those sites. Significant changes will be notified to users via email or banner notice where legally required.*

## 1 COMMITMENT TO DATA SECURITY

ATOL applies appropriate technical and organisational measures to protect your information from unauthorised access, alteration, disclosure, or destruction.

Access to personal information is restricted to authorised personnel, agents, and contractors who require it for legitimate business purposes and are bound by confidentiality and data-processing agreements.

We maintain high standards of data security to ensure your personal information is handled safely and in accordance with applicable privacy laws.

## 2 MANAGING YOUR PERSONAL INFORMATION

### 2.1 Accessing Your Personal Information

You may request access to, correction of, restriction of, or deletion of your personal information held by ATOL, or ask for it in a structured, commonly used, machine-readable format.

Requests must be submitted via contact details in Section 2.3 (Privacy Contact Information). ATOL may verify your identity before acting on a request. Verified requests are processed within 30 days unless a legal extension applies.

### 2.2 Right To Erasure of Your Personal Information

You may request deletion of your personal information where it is no longer necessary, where you withdraw consent and no other legal basis applies, or where erasure is required by law.

If deletion cannot occur due to legal, regulatory, or operational requirements, your data will be securely restricted until removal is permissible.

Requests should be submitted via the contact details in Section 2.3 (Privacy Contact Information).

Before fulfilling any request, ATOL may verify your identity to protect your data. Verified requests are processed within 30 days unless a legal extension applies.

This policy ensures that your personal data is handled in compliance with legal standards, while also balancing the need for retaining data for essential service delivery, legal, and financial purposes.

## 2.3 Privacy Contact Information

If you have any questions about this Privacy Policy or wish to exercise your data-protection rights, please contact:

Privacy Officer, Auditor Training Online (ATOL)  
Email: [info@auditortrainingonline.com](mailto:info@auditortrainingonline.com)

If you reside in the EEA, UK, or Switzerland and are unsatisfied with ATOL's response, you may contact your local data-protection authority.

For general consent and cookie preferences, you can also use the "Manage Preferences" link available on our website.

## 3 USE OF INFORMATION

We use your data to:

- deliver courses and related services
- process transactions
- communicate with you about your account and progress
- improve our website and training experience
- personalize learning and content

ATOL does not make decisions about individuals that are based solely on automated processing (including profiling) and that produce legal or similarly significant effects.

Where AI tools such as analytics features assist our staff, all outcomes are reviewed by a human before action is taken.

### 3.1 Email Communications

With your consent, ATOL may send you updates, offers, and information relevant to your enrolments. Consent is obtained through a clear affirmative action, such as ticking a consent box, and complies with the GDPR, UK-GDPR, and Australian Privacy Principles (APP 7).

You may update or withdraw your consent at any time using the unsubscribe or "Manage Preferences" link in each email or as described in Section 4.3 (Explicit Consent).

Opting out of marketing communications does not affect essential service emails such as enrolment confirmations or payment receipts.

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ATOL does not sell or share contact information for any third-party marketing purposes.

## 3.2 Sharing of Personal Information

We share personal data only when necessary to deliver services, meet legal obligations, or fulfill contractual requirements. Shared categories include:

- Service providers (hosting, payment, analytics, credentialing) under data processing agreements
- Regulators or accreditation bodies (for qualifications and compliance)
- Legal authorities when required by law
- Investigating fraud that has already taken place. The information is not provided to these companies for marketing purposes. or,
- When your enrolment has been arranged and paid for by your employer or a sponsor organization, progress and completion updates will be provided to this third party upon their request.

For a list of relevant third-party service providers, see Section 7 (Third-Party Services).

ATOL does not sell or share personal data for cross-context behavioural advertising.

## 3.3 Use of AI Tools

ATOL uses AI-enabled features within our business systems (e.g., CRM, customer support, and learning platform) to help summarise information, detect duplicate records, surface insights, and improve service quality.

- Purposes: internal analytics, data quality, service improvement, user support.
- Lawful bases: legitimate interests (service improvement and security) and/or performance of a contract (delivering and supporting your enrolment and learning).
- Human oversight: AI outputs are reviewed by ATOL staff before action is taken; AI does not make final decisions that affect your rights or access to services.
- Training use: Personal information is not contributed to public/open-source AI models and is not used to train third-party foundation models beyond what is necessary to provide the service under contractual data-protection terms.
- Data minimisation: We limit inputs to what is necessary and apply technical and organisational controls to protect your information.

### 3.3.1 HubSpot CRM and AI Features

ATOL uses HubSpot as its Customer Relationship Management (CRM) platform to manage enquiries, learner accounts, and marketing preferences. HubSpot includes AI-

assisted tools that help automate workflows and improve service quality.

HubSpot acts as ATOL's data processor under its [Customer Data Processing Agreement](#). Personal data handled by HubSpot's AI tools is not used to train public or open-source AI models.

Processing is governed by HubSpot's [Privacy Policy](#), and [Artificial Intelligence Policy](#).

ATOL's use of HubSpot AI is limited to internal data management, analytics, and customer support with human review, consistent with Section 3.3 (Use of AI Tools).

## 4 COLLECTION OF INFORMATION

### 4.1 Identifiable Information

We collect personal information such as your name, contact details, and information you provide when creating an account, enrolling in a course, or communicating with us.

We also collect limited technical information such as your device type, IP address, and browser settings to maintain security and improve service performance.

We process this information under lawful bases including consent, performance of a contract, legitimate interests, and legal obligations.

For details on analytics and tracking technologies, see Section 6 (Cookies and Tracking Technologies).

### 4.2 Credit Payment Information

Payments are processed securely by PCI-compliant providers ([PinPayments](#), [PayPal](#), [ZipPayments](#)).

ATOL does not store credit card details. Transaction data is retained only for verification and legal compliance.

### 4.3 Explicit Consent

When you provide personal information to ATOL, you will be clearly asked to give consent for its collection and use. This consent applies to information you provide directly to us through our forms, enrolments, or communications.

You may withdraw or modify this consent at any time via the "Manage Preferences" link or by contacting ATOL as described in Section 2.1.

Separate consents apply for:

- Cookies and analytics (Section 6);
- Marketing emails (Section 3.1); and
- AI-assisted processing (Section 3.3).

For users under 16 years of age, parental or guardian consent must be provided before any personal information is submitted.

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## 5 DATA COLLECTION, STORAGE AND CROSS-BORDER TRANSFERS

ATOL stores and processes personal data securely on servers operated by trusted service providers within Australia and other countries.

When personal data is transferred outside the European Economic Area (EEA), United Kingdom (UK), or Switzerland, ATOL ensures appropriate safeguards are in place, including the use of the European Commission's Standard Contractual Clauses (SCCs), the UK Addendum, or other legally recognised mechanisms.

Transfers to U.S.-based service providers such as Google, Microsoft, and HubSpot rely on certification under the EU, U.S. Data Privacy Framework, UK Extension, or Swiss, U.S. DPF.

Data is retained only as long as necessary for its intended purpose and then securely deleted or anonymised.

For details on safeguards, see the [European Commission SCC Decision \(2021/914\)](#).

## 6 COOKIES AND TRACKING TECHNOLOGIES

### 6.1 Use of Cookies

Cookies are small text files placed on your device to help websites function, remember your preferences, and improve your experience. We use the following types of cookies and similar technologies:

- Essential cookies, required for website operation, such as login and security functions.
- Analytics cookies, help us understand how our website and learning platform are used so we can improve performance.
- Marketing cookies, enable advertising and measure the effectiveness of campaigns.

### 6.2 Consent and Control

Non-essential cookies (analytics and marketing) are disabled until you provide consent through our cookie-preference banner.

You can change or withdraw this consent at any time using the "Manage Preferences" link or by contacting ATOL.

Refusing non-essential cookies will not affect access to course content or essential site functions.

### 6.3 Third-Party Tools

ATOL implements Google Consent Mode and Microsoft Clarity/Advertising only after consent is provided.

For details on how these services process data, see Section 7 (Third-Party Services) or visit the [Network Advertising Initiative Opt-Out Page](#).

## 7 THIRD PARTY SERVICES

### 7.1 AI service provider controls.

Where ATOL uses AI features provided by below referenced partners, processing occurs under contractual data-processing terms; personal information is not used to train public/open-source models, and controls prevent provider reuse for unrelated purposes.

These features operate in line with your cookie/consent choices in Section 6 and ATOL's human-review practice in Section 3.3.

### 7.2 Google Services

ATOL employs Google services selectively, based on user location and consent, to enhance user experience and comply with data protection laws.

Where required under GDPR/UK-GDPR, Data collection will only occur with your explicit consent. For visitors within these applicable regions, ATOL does not enable the Google services listed below by default, respecting the General Data Protection Regulation (GDPR) requirements for consent and data protection.

The following Google services used on our site:

- **Google Analytics:** This tool aggregates data on site traffic and interactions, aiding in the improvement of our website. It uses cookies for data collection, adhering to Google Analytics Terms of Service.
- **Google Ads & Remarketing Services:** ATOL uses Google Ads, including Enhanced Conversions, for remarketing and advertising analytics. Data collected through these services may include online identifiers, device information, and site interactions. ATOL has adopted the Google Ads Data Processing Terms, which define Google as a "processor" of personal data for these services.

For comprehensive details on these services and available opt-out options, please visit the following official resources:

- [Google Privacy & Terms](#) , overview of how Google collects and processes data
- [Google Analytics Opt-Out Browser Add-On](#) , stop data being sent to Google Analytics
- [Google Ad Settings](#) , [control](#) personalised advertising across Google services.

### 7.3 Microsoft Services

Microsoft Advertising and Data Sharing Notice

Our website uses Microsoft Advertising, Microsoft Clarity and its associated tracking technologies (such as the Universal Event Tracking (UET) tag). As part of this functionality, Microsoft may collect or receive certain data about your interactions with our website, including online

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identifiers, browsing activity, heatmaps and session replay to improve and market our products and services. We use this information for site optimization, security purposes, and advertising.

For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

You can learn more about Microsoft's data collection and control your preferences at:

- [Microsoft Advertising Privacy & Data Collection](#)
- [Microsoft Privacy Dashboard](#)

These activities comply with applicable data-protection laws, including the GDPR, UK-GDPR, and ePrivacy Directive, and rely on your consent for non-essential tracking as described in Section 5 (Cookies and Tracking Technologies).

## 7.4 Social Media

ATOL may use third-party platforms such as LinkedIn and Meta (Facebook and Instagram) for advertising. These platforms may use cookies to deliver relevant ads based on user interactions.

- LinkedIn Ads: To change your ad preferences on LinkedIn, visit [their ad settings](#).
- Meta Ads (Facebook & Instagram): Update your ad preferences for both Facebook and Instagram through their [respective settings](#).

Users can manage ad preferences directly through each platform or globally via the [Network Advertising Initiative Opt-Out Page](#).

Please be aware that additional social media tools may be hosted by third parties or directly on our site. The privacy practices of these tools are not covered by our privacy policy. Instead, your interaction with these features is subject to the privacy policies of the platforms providing them.

We encourage you to familiarize yourself with the privacy policies of these respective platforms to understand how they manage your data. By engaging with these social media features, you consent to the data practices of these third-party platforms.

## 8 ACCREDITATION AND CREDENTIALING PARTNERS

### 8.1 Exemplar Global

When you enrol in courses offering Exemplar Global RTP or TPECS qualifications, you agree to share your first name, surname, and email address with Exemplar Global. This information is vital for completing your enrolment process and issuing your Certificates of Attainment/Qualification.

At the time of enrolment, you will be asked to thoroughly review and agree to this privacy policy, along with the terms and conditions of enrolment. You must provide explicit consent, acknowledging your understanding of, and agreement to these terms, including the sharing of your information as described.

Please note, without your explicit consent to these terms, we are unable to issue any Exemplar Global-aligned qualification.

### 8.2 VET Reporting and USI Registration (Australian NRT Qualifications Only)

ATOL adheres to the Australian Vocational Education and Training (VET) reporting standards, ensuring the completion of quarterly and annual AVETMISS (Australian Vocational Education and Training Management Information Statistical Standard) reports for participants enrolled in and completing Nationally Recognised Training (NRT) and Competency Units. These reports are crucial for maintaining the integrity and recognition of the VET qualifications.

The National Centre for Vocational Education Research ([NCVER](#)) plays a vital role in collecting and managing VET sector data in Australia, utilizing AVETMISS Validation Software to ensure data meets the required standards for consistency and quality.

Our policy is designed to clarify the significance and application of VET data for participants, detailing its role in supporting the Australian VET system, the structure of data collections, and the type of data collected. This approach aims to enhance transparency and foster a deeper understanding of statistical standards and reporting processes.

**USI Registry Note:** For a graduate's qualification to be officially recorded and recognized on their Unique Student Identifier (USI) transcript, it is essential that their data is included in and accurately uploaded to the quarterly and annual AVETMISS data submissions. This integration ensures the visibility and verification of their achievements within the Australian VET framework.

Upon enrolment, participants must review and agree to ATOL's privacy policy and the terms and conditions of enrolment, which includes providing explicit consent for the sharing of their information for AVETMISS reporting and USI registry purposes. Without this consent, ATOL is unable to issue any NRT-aligned qualification. This consent process is rooted in our commitment to full transparency, adherence to data protection and privacy laws, and our dedication to protecting your personal information.

### 8.3 ATOL Digital Credentials

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Our ATOL Digital Credentials are created in collaboration with [Credly](#), powered by Pearson. By registering for an ATOL course, you consent to us sharing your first name, surname, email address, and qualifications with Credly.

This information is necessary to create and distribute your digital credentials and badges. Participants will have the opportunity to claim their digital credentials; this process includes enrolment in the Credly Acclaim platform and providing explicit consent and acknowledgement of [Credly's Privacy and Cookie Policy](#).

## 9 RELATED POLICIES AND PROCEDURES

- ATOL General Terms & Conditions
- ATOL Training and Assessment Policy
- ATOL Complaints and Appeals Policy

## 10 DEFINITIONS

**GDPR:** General Data Protection Regulation (EU) 2016/679.

**Personal Data:** Information relating to an identified or identifiable natural person.

**Processing:** Any operation performed on personal data (collection, use, disclosure, etc.).

**AI (Artificial Intelligence):** Technology that uses automated analysis or predictive modelling to assist human decision-making.

**Third Parties:** External organisations that process data on ATOL's behalf (e.g., technology providers, accreditation bodies, CRM platforms).

**Automated decision-making / profiling:** Processing conducted without human involvement that produces legal or similarly significant effects on an individual.

## PRIVACY POLICY VERSION HISTORY

VERSION	ISSUED	AMENDMENT NOTES
v11	10/10/2025	<ul style="list-style-type: none"> <li>- Full restructure and simplification of layout, including revised wording for plain language and compliance clarity</li> <li>- Added AI use transparency (HubSpot, CRM tools)</li> <li>- Expanded cookie and consent details (Google, Microsoft)</li> <li>- Updated cross-border transfer and SCC/DPF compliance</li> <li>- Combined Access/Erasure sections for GDPR alignment</li> <li>- Consolidated Third-Party clauses (Google, Microsoft, Meta, LinkedIn, HubSpot, Exemplar Global, Credly, NCVER)</li> </ul>