

RTO RADAR – PRIVACY POLICY

Last Updated: 6 November 2025

1. Purpose and Scope

This Privacy Policy explains how Adeptly Group Pty Ltd (ABN 65 671 544 344), trading as RTO Radar (“RTO Radar”, “we”, “us”, “our”), collects, uses, discloses, and protects personal information through our cloud-based compliance management platform and related services.

RTO Radar complies with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

By using our platform or services, you consent to the collection and handling of personal information in accordance with this Policy.

RTO Radar supports Australian Registered Training Organisations (RTOs) in meeting the Standards for RTOs (SRTO 2025) and may also manage CRICOS-related data for international students under ASQA regulatory frameworks.

2. What Personal Information We Collect

We collect personal information necessary to provide and improve our services to Registered Training Organisations (RTOs) and their users.

The types of information we may collect include:

- User Profile Data (name, role, contact details, login credentials)
- Authentication Data (user ID, organisation ID, access tokens)
- Uploaded Files and Records (compliance documents, trainer qualifications, policies, reports)
- System and Usage Data (audit logs, validation records, activity logs)
- AI Processing Data (document snippets processed for validation or mapping tools)

Where practicable, information is collected directly from you. In some cases, data may be provided by your organisation’s administrator through the platform.

We will notify you where reasonable and explain why information is being collected and how it will be used.

3. Sensitive Information

Our platform may store sensitive information, such as staff qualifications, student records, or other compliance documentation. Sensitive information will only be used:

- For the purpose for which it was collected;

- For a directly related secondary purpose you would reasonably expect; or
- With your consent, or as required by law.

4. How We Use Personal Information

RTO Radar uses collected information to:

- Provide, maintain and improve our platform;
- Facilitate compliance management, validation and reporting;
- Enable authentication and authorisation of users;
- Provide support and respond to enquiries;
- Monitor platform integrity and security; and
- Comply with our legal obligations.

We do not sell, rent, or trade personal information.

5. Disclosure to Third Parties

We only disclose information where necessary to deliver our services or when required by law.

Your information may be shared with:

- Supabase (Sydney region) for secure data hosting and authentication.
- aXcelerate, Lovable Cloud AI, and OpenAI API for integrations that support analytics, validation and AI-assisted functionality.
- Regulatory bodies or law enforcement, if required by law.

All data is stored in Australian-based infrastructure, and cross-border disclosures are limited to temporary processing via the OpenAI API. No data transmitted through AI integrations is retained or used for model training.

We require all third-party providers to maintain privacy and data security standards consistent with Australian law.

6. Security of Personal Information

We take reasonable steps to protect your personal information against loss, unauthorised access, use or disclosure.

Security measures include:

- Encrypted data storage and transmission
- Role-based access controls
- Row-level data isolation
- Secure token-based authentication
- Continuous audit logging
- Regular system monitoring and updates

Administrative impersonation and support access are logged with timestamp and authorisation for transparency.

7. Access, Correction and Control

You may access or correct your personal information at any time by logging into your RTO Radar account or contacting us.

We will take reasonable steps to ensure that personal information is accurate, complete, and up to date. If you believe your information is incorrect, please contact us for prompt correction.

For privacy-related inquiries or to access personal information, email info@rtoradar.com.au.

8. Data Retention and Archival

Personal information is retained only for as long as necessary to provide the service or comply with legal requirements.

When personal information is no longer required for the purposes outlined in this Policy, we will take reasonable steps to destroy or permanently de-identify it, subject to any legal obligations to retain it.

When your account is closed or inactive:

- Customer Data is retained for 12 months, then securely deleted.
- You will be notified before data deletion.
- Backups are securely purged following expiry of the retention period.

The RTO Radar application includes course archiving (soft delete with restore capability) and document version control to support your internal retention workflows.

RTO Radar may retain de-identified, aggregated data for statistical and analytical purposes.

You are responsible for exporting and archiving any information required for your own ASQA or AVETMISS compliance and long-term recordkeeping.

9. Data Breach Notification

If we become aware of a data breach that is likely to result in serious harm, we will:

1. Investigate the incident immediately;
2. Take steps to contain and mitigate the impact;
3. Notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in accordance with the Notifiable Data Breaches (NDB) scheme.

10. Cross-Border Data Handling

All personal information is hosted in Australian data centres (Supabase – Sydney region).

Any temporary transmission through the OpenAI API for AI features is encrypted, not

logged, and processed only for the purpose of delivering requested functionality.

No personal data is permanently transferred or stored outside Australia.

11. Cookies and Analytics

The RTO Radar website and platform may use cookies or analytics tools to:

- Enhance user experience and navigation;
- Analyse usage patterns to improve system performance.

Cookies do not contain personal information. You may disable cookies in your browser, though this may affect functionality.

12. Updates to This Policy

We may update this Privacy Policy periodically to reflect system or legal changes.

Material updates will be communicated at least 30 days in advance, and continued use of our platform constitutes acceptance of the updated policy.

13. Contact Us

Adeptly Group Pty Ltd (t/a RTO Radar)

ABN 65 671 544 344

Email: info@rtoradar.com.au

Website: <https://rtoradar.com.au>

Location: Victoria, Australia