

About This Privacy Policy

In this Privacy Policy, “we”, “us” or “our” refers to the Clean Health Group of companies, which includes:

Entity	ABN	Role
Australian Institute of Fitness Pty Ltd (“AIF”)	14 098 156 471	Registered Training Organisation (RTO ID: 121508)
Vast Fitness Academy Pty Ltd (“VFA”)	14 492 461 636	Registered Training Organisation (RTO ID: 41564)
Clean Health Holdings Pty Ltd (“CHH”)	14 366 121 233	Group holding company and non-accredited education provider

This Privacy Policy explains how we collect, hold, use, disclose and protect personal information in connection with our websites, learning management systems, student management systems, and related services (together, the “Platforms”).

We are bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (“APPs”). As Registered Training Organisations, AIF and VFA are also subject to the National Vocational Education and Training Regulator Act 2011 and associated legislative instruments, including the Standards for Registered Training Organisations and the Data Provision Requirements 2012.

We may update this Privacy Policy from time to time by publishing changes on our websites. Where changes are material, we will take reasonable steps to notify you, for example via email or through our Platforms.

2. Who This Privacy Policy Applies To

This Privacy Policy applies to:

- Students and prospective students of AIF, VFA, or Clean Health courses and programs, whether accredited or non-accredited.
- Visitors to our websites, including fitness.edu.au, vastfitnessacademy.edu.au, and cleanhealth.edu.au.
- Individuals who interact with our marketing, advertising, or social media channels.
- Individuals who contact us for support, enquiries, or complaints.
- Job applicants and contractors.

Personal information includes information that identifies you or could reasonably identify you, such as your name, contact details, date of birth, and Unique Student Identifier (“USI”).

3. What Personal Information Do We Collect?

We may collect the following types of personal information, depending on the nature of your interaction with us:

- Identity and contact information.** Name, email address, phone number, residential address, date of birth, gender, and emergency contact details.



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(b) Enrolment and education information. Course selections, enrolment status, prior qualifications, language and literacy information, employment status, and demographic information required for AVETMISS reporting (for accredited courses).

(c) Unique Student Identifier (USI). As required by the Student Identifiers Act 2014, we collect and verify USIs for all students enrolled in nationally recognised training. The USI is a government-related identifier and is handled in accordance with APP 9.

(d) Payment and billing information. Payment method, billing address, transaction identifiers, and payment plan details. We do not store full card details on our systems. Payments are processed by our payment providers, Stripe and PayPal, who handle card details in accordance with their own privacy policies and PCI-DSS requirements.

(e) Course progress and assessment information. Assessment submissions, grades, competency outcomes, attendance records, practical placement records, and course completion data.

(f) Support and service information. Support requests, complaints, correspondence, and records of interactions with our Experience Team.

(g) Device and usage information. Device type, operating system, browser type, IP address, log data, and interactions with our Platforms, collected through cookies and similar technologies.

(h) Marketing and analytics data. Website traffic, page views, conversion data, advertising performance data, and email engagement metrics.

4. How We Collect Personal Information

We collect personal information directly from you when you:

- (a) Submit an enquiry, lead form, or expression of interest through our websites or advertising channels.
- (b) Complete an enrolment form or application for an accredited or non-accredited course.
- (c) Use our learning management systems, student portals, or other Platforms.
- (d) Interact with our websites, content, and advertising, including through cookies and analytics tools.
- (e) Contact us for support, submit a complaint, or otherwise communicate with us.
- (f) Apply for a role or position with us.

We may also collect personal information from third parties, including:

- (a) Government agencies and regulators, including ASQA, NCVET, the Department of Education, and state training authorities.
- (b) Employers and industry partners, where relevant to your training or employment outcomes.
- (c) Other entities within the Clean Health Group, where you have engaged with multiple brands within the group.
- (d) Referral partners and lead generation platforms.

Where we collect personal information from a third party, we take reasonable steps to ensure you have been notified of the collection, or we will notify you as soon as practicable.



5. Why We Collect, Use and Disclose Personal Information

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

(a) Service delivery. To process your enrolment, deliver training and assessment, manage your student account, and issue qualifications and statements of attainment.

(b) Payment processing. To process course fees, payment plans, refunds, and related financial transactions.

(c) Regulatory compliance. To meet our obligations as RTOs under the National Vocational Education and Training Regulator Act 2011, including AVETMISS data reporting to NCVET and state training authorities, and compliance with the Standards for Registered Training Organisations.

(d) Government funding administration. To administer government-funded training places, including VET Student Loans (AIF), NSW Smart and Skilled (AIF), WA Jobs and Skills (AIF), and QLD Skills Assure Supplier (VFA). This includes reporting to the relevant Commonwealth and state government departments.**(e) Student support.** To provide academic support, welfare services, reasonable adjustments, and to manage complaints and appeals.

(f) Communication. To send you service, support, and administrative messages, including reminders, technical notices, updates, and information you have requested.

(g) Marketing. To send you marketing and promotional messages about our courses, products, and services, and those of our group companies and industry partners, that may be of interest to you. You can opt out at any time using the unsubscribe link in any marketing communication or by contacting us.

(h) Platform improvement. To operate, protect, improve, and optimise our websites, Platforms, and services, including through analytics, research, and user experience testing.

(i) Legal obligations. To comply with our legal obligations, resolve disputes, enforce our agreements, and respond to lawful requests from government agencies and regulators.

(j) Employment. To assess your application for employment or engagement as a contractor.

6. Who We Disclose Personal Information To

We may disclose personal information to:

(a) Other entities within the Clean Health Group. Your personal information may be shared between AIF, VFA, and CHH for purposes related to your enrolment, training, student support, and the improvement of our services. Where you enrol through one brand but your course is delivered by another entity within the group, your information will be shared with the delivering entity.

(b) Industry partners. We may share your information with industry partners for purposes related to employment outcomes, practical placements, and industry engagement.

(c) Government agencies and regulators. Including ASQA, NCVET, the Department of Education, state and territory training authorities (including Training Services NSW, the WA Department of Training and Workforce Development, and the QLD Department of Employment, Training and Education), and the Australian Taxation Office.

(d) Third-party service providers. Including providers who assist us in operating our Platforms and delivering our services. Our key service providers include:

Provider	Purpose	Data Location
aXcelerate	Student management system	Australia
LearnDash	Learning management system	United States
Stripe	Payment processing	United States
PayPal	Payment processing	United States / Global
HubSpot	CRM and marketing automation	United States
Mailchimp	Email marketing	United States
Front	Customer support communications	United States
Google Analytics	Website analytics	United States
Meta (Facebook) Pixel	Advertising analytics	United States
Hotjar	User experience analytics	European Union

(e) Professional advisers. Including legal, accounting, and auditing professionals.

(f) Payment systems operators. Including merchants and financial institutions involved in processing payments.

(g) Business transferees. Any party to whom our assets or businesses (or any part of them) are transferred or proposed to be transferred.

(h) Law enforcement and regulators. Government agencies, regulatory bodies, and law enforcement agencies, as required, authorised, or permitted by law.

7. Disclosure of Personal Information Outside Australia

Several of our third-party service providers store and process data on servers located outside Australia, primarily in the United States and the European Union, as set out in the table in Section 6 (d) above.

Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure the recipient handles personal information in a manner consistent with the APPs. This includes reviewing the privacy and security practices of our service providers and, where appropriate, entering into contractual arrangements that require compliance with Australian privacy standards.

8. NCVER Privacy Notice (Accredited Courses)

If you are enrolled in a nationally recognised VET qualification with AIF or VFA, we are required to collect and disclose certain personal information to the National Centre for Vocational Education Research ("NCVER").

Personal information disclosed to NCVER may be used or disclosed for the following purposes:

- (a) Issuing a VET Statement of Attainment or VET Qualification, and populating authenticated VET transcripts.
- (b) Facilitating statistics and research relating to education, including surveys.
- (c) Understanding how the VET market operates, for policy, workforce planning, and consumer information.
- (d) Administering VET, including program administration, regulation, monitoring, and evaluation.



You may receive a student survey from NCVET. You may opt out of the survey at the time of being contacted. NCVET will collect, hold, use, and disclose your personal information in accordance with the Privacy Act 1988 (Cth), the National VET Data Policy, and NCVET's own privacy policy, available at www.ncvet.edu.au/privacy.

9. Government Funding Specific Privacy Requirements

9.1 VET Student Loans (AIF Only)

If you are accessing a VET Student Loan for an approved course with AIF, your personal information will be collected, used, and disclosed in accordance with the VET Student Loans Act 2016 and the Higher Education Support Act 2003. This includes disclosure to the Department of Education for the purposes of administering the VET Student Loans program, issuing Commonwealth Assistance Notices, and managing HELP debt balances.

9.2 NSW Smart and Skilled (AIF Only)

If you are enrolled in a Smart and Skilled funded place with AIF, your personal information may be disclosed to Training Services NSW (within the NSW Department of Education) for the purposes of administering the Smart and Skilled program. You will be required to complete a Consent to Use and Disclosure of Personal Information Form as part of your enrolment.

9.3 WA Jobs and Skills (AIF Only)

If you are enrolled in a Jobs and Skills WA funded place with AIF, your personal information may be disclosed to the WA Department of Training and Workforce Development for the purposes of program administration, regulation, monitoring, and evaluation. Your data may also be used for statistical, regulatory, and research purposes.

9.4 QLD Skills Assure Supplier (VFA Only)

If you are enrolled in a Skills Assure funded place with VFA, your personal information may be disclosed to the QLD Department of Employment, Training and Education for the purposes of administering the Skills Assure program, including compliance monitoring and evaluation.

10. Cookies and Tracking Technologies

We use cookies and similar tracking technologies on our websites to improve your experience, analyse website usage, and deliver targeted advertising.

Types of cookies we use:

Cookie Type	Purpose	Examples
Essential	Required for website functionality, such as session management and security	Session cookies, authentication tokens
Analytics	Help us understand how visitors interact with our websites	Google Analytics, Hotjar
Marketing	Used to deliver relevant advertising and measure campaign performance	Meta Pixel, Google Ads
Preference	Remember your settings and preferences	Language, display preferences



You can manage your cookie preferences through your browser settings. Disabling cookies may affect the functionality of our websites. For more information about how Google Analytics and Meta use your data, please refer to their respective privacy policies.

11. Security of Personal Information

We take reasonable steps to protect your personal information from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure. Our security measures include:

- (a) Access controls and role-based permissions across all systems, ensuring only authorised personnel can access personal information relevant to their role.
- (b) Encryption of data in transit and at rest across our key platforms.
- (c) Regular security reviews and access audits.
- (d) Staff training on privacy obligations and data handling practices.
- (e) Secure destruction of personal information that is no longer required, through electronic deletion and, for paper records, secure shredding.

However, no method of electronic transmission or storage is completely secure, and we cannot guarantee the absolute security of your personal information.

12. Data Breach Notification

In the event of a data breach that is likely to result in serious harm to individuals, we are committed to managing it in accordance with the Notifiable Data Breaches (NDB) scheme under the Privacy Act. Our response plan includes:

- (a) Containment: We will take immediate steps to contain the breach and prevent any further unauthorised access or disclosure.
- (b) Assessment: We will conduct a swift and comprehensive assessment to determine the extent of the breach and whether it is likely to result in serious harm to any individuals.
- (c) Notification: If we determine that the breach is an "eligible data breach" under the NDB scheme, we will notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as soon as practicable. The notification will include a description of the breach, the kinds of information involved, and recommendations about the steps individuals should take in response.
- (d) Review: After any data breach, we will conduct a thorough review of our security measures and procedures to identify and implement improvements to prevent a recurrence.

13. Retention and Deletion of Personal Information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, meet our legal and regulatory obligations, resolve disputes, and enforce our agreements.

For accredited courses, student records are retained for a minimum of 30 years from the date of completion or withdrawal, as required by the Standards for Registered Training Organisations. Assessment records are retained for a minimum of 6 months from the date of the assessment decision, or longer where required by specific funding agreements.

For non-accredited courses, student records are retained for a minimum of 7 years from the date of last interaction, in accordance with general Australian record-keeping requirements.



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We will delete or de-identify personal information on request where required by applicable law, subject to our legal retention obligations.

14. Anonymity and Pseudonymity

You have the option of not identifying yourself, or using a pseudonym, when dealing with us in relation to general enquiries or other situations where your identity is not required. This includes using generic email addresses or usernames when accessing public areas of our websites.

However, we are required by law to verify your identity when you enrol in a nationally recognised qualification, apply for government-funded training, or access a VET Student Loan. In these circumstances, anonymity or pseudonymity is not available.

15. Accessing and Correcting Your Personal Information

You have the right to request access to the personal information we hold about you, and to request its correction if you believe it is inaccurate, out-of-date, incomplete, or misleading.

To request access to or correction of your personal information, please contact us using the details in Section 17 below. We will respond to your request within 10 Business Days. We may need to verify your identity before processing your request.

In some circumstances, we may not be able to provide you with access to all of your personal information. Where this is the case, we will explain the reasons for our refusal in writing and inform you of the complaint mechanisms available to you.

There is no charge for requesting access to or correction of your personal information.

16. Use of Personal Images and Testimonials

We may use student images, case studies, and testimonials as part of our promotional activities. We will always request your consent before using your image or comments for marketing purposes. Consent is obtained through the enrolment form or a separate Image and Testimonial Consent Form.

You may withdraw your consent at any time by contacting us using the details in Section 17 below.

17. Making a Privacy Complaint

If you believe we have breached the Privacy Act 1988 (Cth) or the APPs, or if you wish to make a complaint about how we have handled your personal information, you can:

- (a) Submit a complaint through our website complaints portal at fitness.edu.au/submit-a-complaint or vastfitnessacademy.edu.au/submit-a-complaint.
- (b) Contact us using the details in Section 18 below.

We will acknowledge your complaint within 5 Business Days and respond with a written outcome within 20 Business Days. If you are not satisfied with our response, you may escalate your complaint to the Office of the Australian Information Commissioner ("OAIC") at www.oaic.gov.au.

For complaints related to the handling of VET data by NCVER, you may contact NCVER directly at www.ncver.edu.au.



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18. Contact Us

For questions about this Privacy Policy, to request access to or correction of your personal information, or to make a privacy complaint, please contact us:

	AIF	VFA	Clean Health
Email	info@fitness.edu.au	info@vastfitnessacademy.edu.au	admin@cleanhealth.edu.au
Phone	1300 669 669	1300 069 521	1300 669 669
Address	Level 2, 14 Edgewater Ct, Robina QLD 4226	Level 2, 14 Edgewater Ct, Robina QLD 4226	Level 2, 14 Edgewater Ct, Robina QLD 4226

Privacy Officer: Head of Corporate Governance, Clean Health Group

Email: admin@cleanhealth.edu.au

19. Employee Records

This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act 1988 (Cth) under section 7B(3). A separate internal privacy notice applies to employee data.

20. Links to Third-Party Websites

Our websites may contain links to websites operated by third parties. We are not responsible for the privacy practices of those websites. We encourage you to review the privacy policies of any third-party websites you visit.

21. Version Control

Version	Date	Description	Authorised By
1.0	5 March 2026	Initial unified Clean Health Group Privacy Policy, replacing individual AIF and VFA privacy policies	Head of Corporate Governance

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