

## Air Travel Services Privacy policy

### INTRODUCTION

"Air Travel Services" is committed to protecting your privacy and is bound by the Privacy Act 1988 (Commonwealth) and the 13 Australian Privacy Principles (APP) set out in that Act and effective from 12 March 2014.

This Privacy Policy explains how we deal with and protect your personal information. It explains how you may request to access and correct your personal information and complain about a breach of your privacy. We recommend that you review this policy regularly as we may amend it from time to time.

In this policy, "Air Travel Services" means Air Travel Services Pty Limited.

By providing personal information to us (or allowing another person to do so on your behalf), you agree that this Policy will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as detailed in this Policy. If you do not agree with any part of this Policy, you must not provide your personal information to us and this may affect the services we can provide to you.

### THE PERSONAL INFORMATION WE COLLECT AND WHY

We collect personal information about you that is relevant to your travel arrangements or that will enable us to provide you with our goods and services.

Where possible we will collect personal information directly from you. It is collected when you deal with us over the phone, send us a letter or an email, visit our website, provide information to complete a booking, subscribe to one of our services, such as when you enter competitions, register for promotions, when you subscribe to receive marketing from us (e.g. e-newsletters) or when you request brochures or other information from us. We may also collect your personal information when you complete surveys or provide us with feedback.

Examples of personal information that we may collect details of are: your name, postal address, home and mobile phone numbers, email address, credit card number and expiry date, and details of your flight, hotel and car bookings and other relevant travel details.

In some circumstances, it may be necessary for us to collect personal information about you from a third party. This includes where a person makes a travel booking on your behalf which includes travel arrangements to be used by you (e.g. a family or group booking).

Where this occurs, we will assume you have consented to your personal information being collected by us and to us handling it in accordance with this Policy. You should let us know immediately if you become aware that your personal information has been provided to us by another person without your consent.

When developing your travel profile and often when using our online flights, cruise, hotels and events booking engines, we may also collect information such as the departure city from which you travel your preferences for seat selection or special meals, details about your participation in loyalty or awards programs and applicable

membership numbers and other travel preferences. We also collect any other information that you have elected to provide us, such as gender, activities and lifestyle preferences and favourite destinations.

## HOW WE USE YOUR PERSONAL INFORMATION

### **We may use your personal information to:**

- provide you with travel products and services; consider your request for a product or service;
- promote our relationship with you by providing updates on promotions and services we think may interest you;
- assist in arrangements and reservations with suppliers (such as airlines, tour operators, car hire operators, hotels and insurance providers) in relation to the provision of a product or service;
- collect and process payments, through us or a third party;
- perform all other administrative, accounting and operational tasks (including systems development and testing, staff training, and market or customer satisfaction research);
  
- to facilitate your participation in loyalty programs;
- analyse trends in sales and travel destinations;
- personalise the service or communication we provide to you,
- undertake marketing activities such as mail-outs, emails, e-newsletters, SMS notifications and telephone calls;
- Investigate, detect and protect us and other third parties against, negligence, breach of contract, fraud, theft and other illegal activities.

## ABOUT YOUR SENSITIVE PERSONAL INFORMATION

In some circumstances, we may collect personal information from you which is regarded as sensitive information. As defined by law, this includes personal information such as your racial or ethnic origin, political opinion, religious beliefs or affiliations, criminal record and health information, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

We will only collect sensitive information with your consent and where necessary for, or directly related to make travel arrangements on your behalf. Where you provide sensitive information to us, you consent to us using that

sensitive information for the purpose for which it was collected. Otherwise, we will not collect, use or disclose sensitive information about you unless required to do so by law. For example, if you provide health information to us in connection with a travel insurance application you would like to make, you consent to us using and disclosing that health information in connection with arranging that travel insurance on your behalf.

#### DISCLOSING YOUR PERSONAL INFORMATION?

##### **We may disclose your personal information to:**

- suppliers of products or services which you have selected (such as airlines, tour operators, car hire operators, hotels and insurance providers);
- third party travel service providers who assist in fulfilling the booking you have made;
- our ticketing centre (Express Ticketing) and host and others who assist in providing these services.

third party sponsors or co-sponsors of promotions on our website. Only information collected during a promotion will be disclosed to these parties

- third parties when we contract out some of our functions and activities, such as our preferred mailing house. In these circumstances, we prohibit third parties from using your personal information, except for the specific purpose for which we supply it;
- government authorities in the event of an accident, disaster or emergency; and
- others where we are authorised or required by law to do so.

The consent that you provide under this Policy to the collection and use of personal information by us, applies equally to the parties whose products and services we sell.

#### ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

Subject to any exceptions set out in applicable privacy laws, we invite you to access any personal information we may hold about you. Where personal information we hold about you is not accurate, complete, up-to-date or relevant, you may ask us to correct that personal information, and we will respond to your request within a reasonable time.

We reserve the right to confirm the identity of the person seeking access or correction to personal information before complying with such a request. If we deny access or correction, we will provide you with the reason for such denial.

You must always provide accurate information and you agree to update it whenever necessary. You also agree that, in the absence of any update, we can assume that the information submitted to us is correct.

#### CROSS-BORDER DATA FLOWS

The third parties we disclose your personal information to (our suppliers, travel service providers, call centre operators) may be located overseas.

We will only disclose your personal information to these overseas entities in connection with facilitation of your travel booking and/or to enable the performance of administrative and technical services by them on our behalf. If you have objections to your personal information being disclosed to an overseas recipient, please let us know.

#### LINKED WEBSITES

Our website contains a number of links to other websites. We are not responsible for their privacy policies and these should be checked by you as required.

#### COOKIES AND PIXEL TAGS

When you access our website, we may place cookies, pixels or other code on your computer to collect information about your usage of our website and information about the device you are using to access our website (Session Data). We use Session Data to help us recognise you when you visit our website again and better understand how our website is navigated to and used, so we can improve our website content and ease of use, personalise and improve your individual viewing experiences on our website and provide information that may be of interest to you. We may use service providers to collect Session Data on our behalf. Unless you specifically inform us of your identity (e.g., by registering with us or making a booking through us), we will not know who you are.

#### GEO-LOCATION INFORMATION

When using mobile sites or applications (if applicable), you may search for products and services in the area in which you are located. If you choose to do so, depending on the mobile device or application you are using, your geo-location information may be collected to personalise and improve your experiences on our website and provide information that may be of interest to you. You may at any time disable our collection and use of your location information by turning location services off at the device level.

#### GOOGLE ANALYTICS

When you visit certain sections of our website, Google Analytics, a website analytics service provided by Google, Inc will place cookies on your computer's browser. The information generated by the cookies about your use of our website is transmitted to Google. This information is then used for the purpose of compiling statistical reports to enable us analyse the number of visits to our website pages, the average time spent on the site and the pages viewed. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personal data of visitors to our website. We will not associate any data gathered via use of cookies with any personal data from any source as part of our use of Google Analytics.

You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on

#### STORAGE AND SECURITY OF PERSONAL INFORMATION

We have implemented various physical, electronic and managerial security procedures in order to protect personal information from loss and misuse, and from unauthorized access, modification, disclosure and interference. Security and encryption technologies are regularly reviewed and we will strive to protect your personal information as fully as we protect our own confidential information.

The payment pages on this website are encrypted using the internationally accepted security system SSL (Secure Sockets Layer) to encrypt all credit card payments over the web. This means that the information from these pages are sent back to our server in a secure fashion and cannot be intercepted.

#### INFORMATION ABOUT OTHER TRAVELLERS

If you provide us with information about other people travelling with you (for example, family members), you should make them aware of this Privacy Policy and any privacy collection notices we provide you.

#### MARKETING AND PRIVACY

Serving customers well is very important to us. As part of this service, we may use your personal information to identify a product or service that you may be interested in. We may contact you from time to time to let you know about new or exciting products or services and special offers that may be of interest to you, including information about our business partners' products and services.

#### OPTING-OUT

If you wish to opt-out of receiving marketing communications from us, including communications from us on behalf of our preferred partners, please contact us via email, or use the unsubscribe facility.

#### LINKS AND SOCIAL PLUG-INS

When you click on a third party's link from our website, or from an ad for a third party served by one of our service providers, you will enter that third party's site, over which we have no control. We are not responsible for third party sites. You should carefully review the privacy statements of any other sites you visit, because those privacy statements will apply to your visit to such other sites and may be very different from this Privacy Policy.

Our website includes social plug-ins, such as the Facebook or Twitter button, and gives you the option to post information about your activities on our Site to your social media accounts. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the feature to function properly. Social plug-ins are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing them.