



## APT GROUP

### PRIVACY POLICY

#### MANAGEMENT OF PERSONAL INFORMATION

At APT, we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles (**APPs**) as contained in the *Privacy Act 1988* (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

**Personal information** is information or an opinion about an identified individual, or about an individual who is reasonably identifiable. We collect personal information from and about our prospective and current customers, as well as from and about travel agents, business partners and other travel suppliers.

**Sensitive Information**, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information. We collect sensitive information from and about our customers where such information is included in Government-issued identity documents (eg. passport), and from health and mobility questionnaires.

**Health Information** is information or an opinion about an individual's health or disability, the health services provided or to be provided to them, their expressed wishes for the provision of future health services, personal information collected to provide a health service, personal information collected in connection with organ and body-part donation, and predictive genetic information.

This policy details how APT manages personal information about you (including sensitive information and health information), whether you are a customer, a travel agent, or another kind of travel supplier to our business.

In this policy, APT means the entities within the APT Group, including Australian Pacific Touring Pty Ltd, Australian Pacific (Holdings) Pty Ltd, and their subsidiaries and related entities which operate the APT, APT - Luxury Cruising and Touring, Travelmarvel and Botanica World Discoveries brands.

In the course of offering our travel products and services, the collection of personal information is necessary and unavoidable. However, we aim to only collect personal information that is reasonable and fair in order to deliver the best possible travel products and services.

#### **What personal information we collect and hold**

The kinds of personal information we collect from you or about you depend on the transaction you have entered into with us, the travel products / services you or your organisation have contracted us to provide, and the travel products / services you or your organisation are interested in.

The kinds of personal information and sensitive information that we commonly collect and hold from you or about you include: your name, address, phone, fax and mobile numbers, email address, date of birth, nationality, religion, drivers licence details, passport details, bank account details, travel preferences and experiences, travel insurance and travel rewards and loyalty program membership. We also collect health information relating to your current and previous health status, current and previous medical conditions, and your religious, cultural and dietary requirements. We also collect personal information, sensitive information and health information from or about your family members, next of kin, emergency contact details and/or other members of your travelling party.

We record anonymous clickstream information from every visitor to our website. We use this information to ensure that our website remains relevant and appropriate for the majority of users. We do not make any association between this information and your personal details. For further information, please see our Cookies Policy available at [www.aptouring.com.au/cookies](http://www.aptouring.com.au/cookies).

When you browse our website, contact us electronically, or engage with us on social media, we may also record: geographical tagging, cookies, your IP address and statistical data from your activity.

Credit card details are not stored on APT's servers when you book, or buy travel products through our website. Please refer to our Security Policy available at [www.aptouring.com.au](http://www.aptouring.com.au) for information about how eNett protects your personal information when you make bookings and payments with APT.

### **How we collect and hold personal information**

We aim to collect personal information only directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from your letters, emails, and telephone calls with us, and from your activity and inputs on our website and social media platforms. We also collect personal information from you or about you from booking forms, application forms and other documents that you submit to or through us. We may collect personal information about you as submitted by your family members and/or other members of your travelling party.

However, in many instances we may also receive personal information about you, your family members and/or other members of your travelling party as submitted by third parties, such as your travel agent/s who are making the travel arrangements for you, travel insurers, airlines, hotel partners, tour operators and providers and affiliated travel suppliers.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement (eg. booking travel arrangements); or
- it is impracticable for us to deal with you on such basis.

### **Why we collect, hold, use and disclose personal information**

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities. For example, we collect, hold, use and disclose your personal information as necessary to provide our travel products and services to you or your organisation.

We will routinely disclose some of your personal information to other Australian entities within the APT Group of travel companies.

Our business also necessarily works closely with external travel agents, travel suppliers, airlines, hotel partners, ground tour operators, caterers and travel insurers etc. We routinely disclose your personal information to these third parties for them to assist us in carrying out our business functions and activities. In some instances, these external businesses (especially travel agents) may have direct access to our CRM database for the purpose of providing streamlined booking and reservation services etc.

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. For example, we routinely collect and hold the details on your passport, such as your nationality. In all other situations, we will specifically seek your consent to the collection, use and disclosure of sensitive information. For example, we may seek to collect sensitive information about you where it is necessary or desirable for your travel experience.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the travel products and services that you or your organisation have contracted us to provide.

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, identification checks, fraud checks, providing you with information about other travel products and services offered by us, marketing and promotions, market research, customer feedback and quality assurance surveys, newsletter and magazine communications, statistical collation and website traffic analysis.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Where we use your personal information for marketing and promotional purposes, it is because you have asked to hear from APT, you have entered a competition and agreed to join our mailing list, or a friend / colleague has requested it on your behalf and you have confirmed this to us. You can opt out of our direct marketing efforts at any time by contacting [info@aptouring.com.au](mailto:info@aptouring.com.au) or by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including government departments and enforcement bodies) where required or permitted by law.

### **Contests**

When you enter a contest or other promotional feature on our website, we may ask for your personal information so that we can administer the contest and notify winners. Participation in these contests is completely voluntary and you therefore have a choice whether or not to disclose the required information in order to participate.

### **Online Surveys**

We also value opinions and comments from our customers, and you may have the opportunity to give us your feedback through website and other surveys. In conducting these surveys, we may ask for your personal information so that we can appropriately identify you. Survey and personal information collected will be aggregated and used to make improvements to our website and to improve our products and services.

Participation in these surveys is completely voluntary and you therefore have a choice whether or not to disclose the required information in order to participate.

### **How we hold and store personal information**

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference and loss, and from unauthorised access, modification and disclosure:

- Data held and stored on paper is stored in lockable filing cabinets, within secure premises, with secured entry and monitored alarms.
- Data held and stored electronically (including in the Cloud) is protected by internal and external firewalls, limited access via file passwords, and files can be designated read-only or no access. We also require our IT contractors and other third parties to implement privacy safeguards.
- Data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards.
- Where we disclose personal information to third parties (including contractors and affiliated businesses located locally and overseas), our contractual arrangements with them include specific privacy requirements.
- Our staff receive regular training on privacy procedures.

### **Destruction and De-identification**

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed:

- Paper records are commonly shredded, pulped or disintegrated, or sent for secure destruction.
- Electronic records are deleted from all locations, to the best of our ability, or encrypted and/or placed beyond use

### **Overseas disclosure**

Our business is part of the international APT Group of companies. We will routinely disclose some of your personal information to overseas entities within the APT Group. Our related entities are located in Germany, New Zealand, the UK, Canada and the USA.

Our business is also necessarily affiliated with a range of third party businesses and travel suppliers located overseas. In the course of doing business with you, we will routinely disclose some of your personal information (including sensitive information and health information) to these overseas recipients. Our third party overseas affiliates are located in our APT Destinations, including Africa, Asia, Canada, Alaska, the USA, Egypt, Jordan, Europe, New Zealand, Russia, Scandinavia, the Baltics, South America and the South Pacific.

We will only disclose your personal information to overseas recipients where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or

- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

### **Requests for access and correction**

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please see our Privacy Access, Correction & Complaints Handling Brochure or contact us at [customer.relations@aptouring.com.au](mailto:customer.relations@aptouring.com.au)

To assist us to keep our records up-to-date, please notify us of any changes to your personal information.

### **Complaints and Concerns**

We have procedures in place for dealing complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs. For further information, please see our Privacy Access, Correction & Complaints Handling Brochure or contact us at [customer.relations@aptouring.com.au](mailto:customer.relations@aptouring.com.au).

### **Links**

APT's website may contain links to other websites. Please note that when you click on one of these links, you are entering another website. APT encourage you to read the privacy statements of these linked sites as their privacy policy may differ from ours.

Other websites linked to / from the APT website may not be affiliated or associated with, or controlled by, us. We are not responsible for any content contained on those websites, or any loss you may suffer in relation to the use of those websites. If you visit those websites, you will visit them entirely at your own risk and release us (including our employees and agents) from any and all liability resulting from or in connection with the inclusion of links to other websites or your use of those websites.

We do not endorse or represent the companies, products or content linked to this website and we reserve the right to terminate any link or linking program at any time.

### **Contact**

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May 2014.