

PRIVACY POLICY

TravelEdge Pty Ltd (ABN 70 092 658 421) and its subsidiaries and related bodies corporate (collectively referred to in this document as 'TravelEdge', 'we', 'our' or 'us'), understands the importance of, and are committed to, protecting the privacy and confidentiality of your personal information. We comply with the Privacy Act 1988 (Privacy Act). We are bound by the Australian Privacy Principles (APPs), which regulate how we may collect, use, disclose and store personal information, and how our customers (individuals for whom we arrange travel products and services) ('you') may access and correct personal information we hold about you.

Our privacy practices vary as they must amongst countries in which we operate to reflect local legal requirements. TravelEdge complies with applicable laws in the jurisdictions in which it operates, including the Regulation (EU) 2016/679 General Data Protection Regulation (GDPR) in its handling of personal data of persons in the European Union. It is in our legitimate business interests to provide you with the Services which use the personal data provided to us for the purposes described herein. Your agreement to the terms of this Privacy Policy is not intended to and does not constitute a "consent" to such terms for purposes of the GDPR.

Information We May Collect and Hold

The kinds of Personal Information we collect from you may vary depending upon the nature of the travel services you have engaged us to provide. We collect information about you that we reasonably need for our business functions and activities and which is required by law. Generally, we will collect the following kinds of personal information concerning an individual:

- a) Your name, address and contact details;
- b) Company details (if applicable);
- c) Your date of birth;
- d) Your gender;
- e) Your nationality;
- f) Your financial and credit information for payment purposes;
- g) Travel-related details including passport details, frequent flyer details, drivers' licence, travel preferences and other similar information;

- h) Your employment details including in some cases superannuation information (in the case of group travel packages facilitated by your employer);
- i) Personal identification documents such as your driver's licence or birth certificate;
- j) Your passport details;
- k) Information concerning your visa status or information reasonably required to assist you in obtaining a visa in a jurisdiction other than Australia; and
- l) Where you or your representative have engaged us to assist you in obtaining travel insurance or other similar services, we may also collect and hold sensitive information regarding your personal health and medical history. Pursuant to our obligations arising under the Privacy Act 1988 (Cth), we will only obtain such information if we are required to by law or with your express prior consent.

How We Collect and Hold your Personal Information

We will collect the majority of your Personal Information from you directly, usually through telephone, email or face to face communication, through your completion of a form, subscription to a mailing list, or any combination of these. We may also however obtain your Personal Information from:

- a) Your employer or colleagues, where a travel package is being booked by them on your behalf;
- b) Couriers;
- c) In the case of prospective employees, recruitment agents;
- d) Third parties who hold mailing lists to which you have subscribed;
- e) Third party service providers such as airlines or accommodation providers where your booking is required to be made or amended by us on your behalf.
- f) Our service providers may provide us with your personal information from websites, social media sites, mobile, and other technology-based sources.

We will obtain your consent before contacting any third party for the purposes of collecting your Personal Information.

Do You have to provide us with your personal information?

You can deal with us anonymously (without giving us your name and contact details) or by using a pseudonym (a name that does not include your real name, for example an email address or a user name that you use in an online forum (nickname)).

If you choose to deal with us anonymously or using a nickname, we can give you general information about our products and services, and you may be able to purchase products and services from us for cash or participate in any online forum we provide, but there are some things we cannot do, for example:

- a) We cannot give you information about travel you (or your employer) may have booked or deal with a complaint you may have; and
- b) We cannot provide you with a service or deliver a product or service to you at an address;
- c) You cannot attend one of our networking events or enter one of our promotions anonymously or using a nickname.

You can deal with us using a nickname together with your real name and contact details. If you choose to deal with us in this way, we may collect your personal information together with your nickname. When you identify yourself to us using your nickname only, we can deal with you only as described above. We may ask you to provide proof of your identity if you use a nickname.

The Purposes for which we Collect, Hold, Use and Disclose your Personal Information

We collect, hold, use and disclose your Personal Information for the following purposes:

- a) Providing travel, accommodation and event services to you, your business or your employees;
- b) Providing you with information about other services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- c) Facilitating our internal business operations, including the fulfillment of any legal requirements;
- d) Documenting our relationship with current and prospective employees; and
- e) Analysing our services and client needs with the view of developing new or improved services.

How you May Access or Seek the Correction of Personal Information Held by Us

You may access or seek the correction of any Personal Information held by us by contacting the agent acting on your behalf in any of your current bookings with us. Alternatively, you may contact our Head Office using the contact details available at our website www.traveledge.com.au.

We will deal with your request for such access within a reasonable time. If we refuse access, we will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. We may recover reasonable costs in relation to a request for access to personal information.

How You May Complain about a Breach of the APP's by Us

If at any stage you feel we have breached the APP's in our collection, use, disclosure, storage, security, management or disposal of your Personal Information, you may lodge a complaint with our Privacy Officer in writing using the contact details available on our website www.traveledge.com.au.

We are committed to protecting your privacy and as such we treat all complaints very seriously. Our Privacy Officer will address your concerns with our Company Directors and contact you to ensure you are satisfied with our proposed resolution. If we do not respond to you within 30 days or you are not satisfied with our response, you are entitled to lodge a "Privacy Complaint Form" with the Office of the Australian Information Commissioner. Copies of this form and details relating to lodgement are available at www.oaic.gov.au/privacy/making-a-privacy-complaint.

Our Disclosure of Your Personal Information

We will not use or disclose your personal information for a purpose other than:

- a) a purpose set out in this privacy policy (primary or secondary purpose above);
- b) a purpose you would reasonably expect;
- c) a purpose required or permitted by law;
- d) a purpose otherwise disclosed to you to which you have consented;

Depending on the circumstances, we may disclose your personal information to other people including one or more of the following:

- a) Service providers including travel providers, agents, contractors, IT, security, legal, accounting, researchers, credit providers, credit reporting bodies, marketers, insurers, financial institutions and others;
- b) Our affiliates and related companies;
- c) Government, regulatory and law enforcement authorities, where we are required to or permitted to by law;
- d) Your employer, if you are an employee of our business client; and

e) To prevent or investigate any fraud or crime (or a suspected fraud or crime).

We take reasonable steps to ensure that these organisations are bound by confidentiality, privacy and security obligations with respect to the protection of your personal information.

Trans-border information disclosure:

We may disclose your personal information to an overseas service provider, for example a travel provider, a travel product or service provider, or a customer information call centre. Our overseas travel service providers may be located in any country that you travel to. We may also store your personal information on servers or data centres located in overseas countries.

If it is not practicable or reasonable for us to gain your consent to disclose your personal information to an overseas service provider, we will take reasonable steps to notify you of the specific countries where we disclose your personal information. We will take reasonable steps to ensure that the overseas services provider is bound by privacy, confidentiality and security obligations. If you have any specific questions about where or to whom your personal information will be sent, please contact us using the contact details available at our website www.traveledge.com.au.

Countries in Which Overseas Recipients Likely to be Located

Given the nature of our business, we disclose Personal Information to a broad array of international destinations. We will only disclose your Personal Information to third parties in the country or countries to which you will be travelling during your booking made by us on your behalf. If we intend to disclose your Personal Information to parties outside of this jurisdiction or their jurisdictions, we will obtain your consent prior to such disclosure.

Our Websites

We collect website activity statistics such as the number of visitors, pages visited, time and date of visit and where you accessed our website from, so that we can make informed decisions relating to improving our website and the services we deliver. This information is anonymous and does not identify a person.

When you visit our website, a cookie is placed on your computer. The cookie does not contain personal information that can identify you, but may contain information about the page you visited on our website. If you do not wish for this to occur, you can remove cookies from your computer, by following the standard procedures applicable to your internet browser.



Information Security

We hold your personal information in both paper-based and electronic files. We will take reasonable steps to ensure that your personal information which is held by us is protected from loss and misuse, and from unauthorized access, modification, disclosure and interference.

We maintain various physical, electronic and managerial security systems and procedures to protect your personal information, and regularly review these systems and procedures.

Copies of this Policy are available free of charge upon request.

