

## **Australia Inbound by Orange Journeys - Privacy Policy**

This Privacy Policy sets out how Benden Holdings Pty Ltd (ABN 75 054 736 284) trading as Australia Inbound by Orange Journeys (referred to in this document as “Australia Inbound”, “we”, “our”, or “us”) protects the privacy of your personal information.

Please note that this Privacy Policy and all personal information collected and dealt with by Australia Inbound is subject to the Privacy Act 1988 (Cth) (“Privacy Act”) and the Australian Privacy Principles (“APP”) contained in Schedule 1 of the Privacy Act, as amended from time to time.

### **1. Scope**

This Privacy Policy applies to the collection, holding, use and disclosures of personal and sensitive information provided about individuals to Australia Inbound through the use of the website, [www.australia-inbound.com](http://www.australia-inbound.com), other applications related to Australia Inbound and any services offered or provided by Australia Inbound. In this Privacy Policy we also explain how you can contact us if you have a query about any personal or sensitive information that we may be holding about you.

### **2. Acknowledgement**

By continuing to use the website and/or services or when you purchase services from Australia Inbound, you acknowledge that you have had the opportunity to read this Privacy Policy. You also acknowledge and consent to Australia Inbound collecting, holding, and disclosing personal information supplied by you and retaining and/or using your personal information.

We may do so subject to the terms of this Privacy Policy, the website, any terms and conditions that apply to any goods or services that we provide to you, and any other applicable contracts.

If you provide us with personal and/or sensitive information of a third party individual, for example other people travelling with you, you will be responsible for informing the individual of the existence of this Privacy Policy and obtaining their consent for their personal or sensitive information to be provided to Australia Inbound for the purposes indicated in this Privacy Policy or as otherwise indicated at the time of collection.

### **3. Purpose**

The purpose of this Privacy Policy is to:

- clearly communicate the personal and sensitive information handling practices of Australia Inbound;
- enhance the transparency of Australia Inbound information collection processes; and
- to give individuals a better understanding of the sort of personal information that Australia Inbound holds, and the way Australia Inbound uses or discloses that information.

#### **4. Personal Information**

In this Privacy Policy, “personal information” has the same meaning as defined by section 6 of the Privacy Act, as amended:

*information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- a) whether the information or opinion is true or not; and*
- b) whether the information or opinion is recorded in material form or not.*

Personal information may include your name, address (including previous addresses), information about you (including medical information), contact telephone number(s), e-mail addresses, bank account and credit card details, and details about flight, hotel, transfers and other related travel details and/or other information that is necessary for the delivery of our services to you.

#### **5. Sensitive Information**

We will only collect your sensitive information with your consent and where information is reasonably necessary for one or more of our services.

We will only use and disclose your sensitive information for the primary purpose for which it was collected or a purpose that is directly related to this primary purpose and is reasonably expected. You consent to the use and disclosure on this basis. If for example we have collected information about any medical conditions you are suffering, then you consent to us disclosing this information to our service providers (for example activity providers) if they reasonably have a need to know such information in order to safely supply services for your benefit.

We will not otherwise collect, use or disclose sensitive information about you unless required to do so by law.

In this Privacy Policy, “sensitive information” has the same meaning as defined by section 6 of the Privacy Act. Sensitive information may include information or an opinion about your health information.

#### **6. Collection of personal information**

In the course of regular business activity and in order to use the website and/or our services, Australia Inbound will from time to time collect, require and otherwise deal with your personal and/or sensitive information.

If you do not want any of your personal and/or sensitive information collected, you can stop using the website and/or our services at any time (subject to applicable contracts), however we may not be able to provide our services to you.

Australia Inbound collects personal and/or sensitive information from individuals in numerous ways, including for example when an individual:

- visits or uses the website or social media channels;
- contracts or corresponds with Australia Inbound in person or via telephone, email, mail or directly through our website;
- makes a purchase(s) from Australia Inbound or enquires about travel arrangements with us;
- makes payment of an invoice; or
- provides us with personal and/or sensitive information, including for example allowing information on social media to be shared with us or signing up for a promotion or competition or when you subscribe to receive marketing from us (e.g. a newsletter).

We may also collect personal and/or sensitive information about you from third parties or where Australia Inbound is required to do so by law.

Australia Inbound does not generally take steps to:

- verify personal and/or sensitive information about any individual disclosed to it; or
- seek additional personal and/or sensitive information about any individual on the basis of information disclosed to it, except in circumstances where it is reasonably necessary for us to do so or as may be required by law.

We note that in certain circumstances, if you do not consent to the use of your personal and/or sensitive information as outlined in this Privacy Policy or at the time of collection, you may not have access to our services and we might not be able to provide you with our services.

## **7. Use of personal information**

Any personal information collected by Australia Inbound will be used for the purpose for which it was given to Australia Inbound, for purposes which are directly related to those purposes, for purposes which you have otherwise consented to, or for other purposes in accordance with the Privacy Act, law or this Privacy Policy.

## **8. Disclosure**

We may disclose personal and/or sensitive information we hold to:

- our directors, officers, employees and other associated companies or related entities or organisations;
- our contracted service providers;
- credit card providers, credit reporting and fraud checking agencies;
- government, regulatory and law enforcement agencies where the disclosure is required or authorised by law;
- our professional advisors, including our accountants, auditors and lawyers;
- third party suppliers of products or services which you have selected (such as airlines, ground operators, hotels and insurance providers);
- third party travel service providers who assist in fulfilling the booking you have made;

- our online booking facility operator 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 call centre operators. In these circumstances, we prohibit third parties from using your personal information, except for the specific purpose for which we supply it.

Where applicable, we may handle or disclose personal information relying on applicable exemptions under the Privacy Act, including but not limited to, the related bodies corporate exemption and the employee exemption.

### **9. Storage and Security**

Australia Inbound will take reasonable steps to protect the personal and/or sensitive information we hold from misuse, interference, loss and unauthorised access, modification or disclosure. Australia Inbound may store personal information physically and/or electronically.

### **10. Cookies**

To ensure we are meeting the needs and requirements of our website users, and to continue to develop our online services, we may collect aggregated information through the use of cookies. We may use cookies to collect data about your visit and to allow you to navigate from page to page without having to reload each time.

You may control, refuse and/or delete cookies by using the appropriate setting on your browser as you wish, however, if you do so you may not be able to access portions of our website.

### **11. Links - External Websites**

Please note that our website may contain links to other external websites. These links are provided as a convenience to you. Australia Inbound is not affiliated with these sites and accordingly has no control over, and is not responsible for, their content, activities, privacy practice or other policies. Links to external websites are not covered by this Privacy Policy.

### **12. Direct Marketing Communications**

We may contact you using the contact details, which you provide to us in order to provide you with direct marketing communications about our services in accordance with the law. You may opt out of receiving direct marketing communications from us at any time by contacting us using the details set out below or by functionality within such communications.

### **13. Changes to Privacy Policy**

This is our current Privacy Policy. Please note that we reserve the right to amend, modify, remove or vary this Privacy Policy at any time and without notice. You should check this page

regularly to take notice of any changes we may have made to this Policy. We may notify you of changes to this Privacy Policy via the website.

To obtain a current version of our privacy policy, please contact Australia Inbound via the contact details below.

#### **14. Access to Personal Information**

If you would like access to your personal and/or sensitive information, please contact our office directly via the contact details found below under “Contact”.

#### **15. Correction of Personal Information**

In the event Australia Inbound holds personal and/or sensitive information about you and you believe that any of the information we hold about you is inaccurate, out of date, incomplete, please make a request to our office for correction. Contact details can be found below.

#### **16. Contact**

If you have any questions or concerns about how we handle your personal or sensitive information or if you wish to access or amend personal and/or sensitive information we hold about you, please make a request in writing.

All correspondence should be directed to:

Post : Australia Inbound, 13 Millbank Way, Bega NSW 2550, Australia

Email : [inbound@orangejourneys.com.au](mailto:inbound@orangejourneys.com.au)

Phone : +61 2 9527 4988

If you decide to contact us for any of the reasons above, we request that you provide us with sufficient details regarding your reason for getting in touch with us.

We note that if necessary, we will ask you to provide us with a copy of your ID, passport or other valid identity document.

#### **17. Complaints**

If you have any enquiries about this Privacy Policy or wish to make a complaint about a matter relating to privacy please contact us using the details set out above (refer to “Contact”).

We will investigate and consider any complaint received by us and a response will be provided to the complainant as soon as practicable.

If you are not satisfied with the way in which we handle your inquiry or complaint in regard to your personal information, if applicable, you may contact the Office of the Australian Information Commissioner (“OAIC”). Contact details for the OAIC can be found at [www.oaic.gov.au](http://www.oaic.gov.au).