

Voyages' Privacy Policy

1. Purpose

The purpose of this Policy is to inform individuals how Voyages collects and manages personal information under the Privacy Act.

2. Background

The Privacy Act is an Australian Commonwealth law which regulates the handling of personal information about individuals. It includes thirteen Australian Privacy Principles (APPs) which set out standards, rights and obligations for the handling, holding, use, accessing and correction of personal information (including sensitive information).

Personal information is defined as ***"information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual who is reasonably identifiable..."*** This includes a wide range of information including an individual's name, signature, address, telephone number, date of birth, medical records, bank account details, credit card details, CCTV footage as well as commentary and opinions expressed about an individual.

In the course of our business activities, we collect personal information in various forms about our employees, our guests and on occasion, third parties.

We take our obligations under the Privacy Act seriously and this Policy sets out how we collect and manage personal information. The Policy seeks to provide individuals with details on the following relevant matters:

- a) the kind of personal information we collect;
- b) how we collect personal information;
- c) how we store personal information;
- d) how we use personal information;
- e) whether and how we disclose personal information to third parties;
- f) what choices an individual has regarding our use of an individual's personal information; and
- g) how an individual may access and/or correct personal information about them held by us.

3. Scope

This Policy applies to all of Voyages. It sets out how we manage personal information including that relating to guests, passengers, business partners, third parties as well as employees and job applicants.

Voyages has other policies and procedures which operate with respect to personal information and in relation to very specific situations and those other policies apply to their subject matter and operate in addition to, or at times, instead of this Policy. This would arise for example, in relation to Voyages' employees, our wholesale and retail trade arrangements and airport operations. Specific Voyages' policies governing specific circumstances include Voyages' HR Policies & Procedures, Code of Conduct, ICT Policies & Procedures, Serious Incident Reporting and Escalation Policy, DAMP Policy and Debtors Policy.

This Privacy Policy primarily focuses on our approach to collecting and managing information relating to external third parties however we are equally vigilant in our management of personal information relating to our internal employees and stakeholders.



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By using one of our websites and/or by providing personal information to us, an individual consents to us handling their personal information in accordance with this Policy and/or the specific Voyages' policy relating to the subject matter/circumstances e.g. HR Policies & Procedures.

4. Definitions

The following definitions apply for the purpose of this policy:

Consent has the same meaning as the Privacy Act which is express consent or implied consent.

Personal information has the same meaning as the Privacy Act which is *information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.*

Policies means Voyages' frameworks, policies and procedures as the context requires.

Privacy Act means the Privacy Act 1988 (Cth) (Privacy Act) and includes any Regulations.

Sensitive information has the same meaning as the Privacy Act which includes:

- a) information or an opinion about an individual's:
 - i. racial or ethnic origin; or
 - ii. political opinions; or
 - iii. membership of a political association; or
 - iv. religious beliefs or affiliations; or
 - v. philosophical beliefs; or
 - vi. membership of a professional or trade association; or
 - vii. membership of a trade union; or
 - viii. sexual orientation or practices; or
 - ix. criminal record that is also personal information; or
- b) health information about an individual.

Voyages/we/our/us means Voyages Indigenous Tourism Australia Pty Ltd as the context requires.

5. Policy Statement

5.1 Collection of Personal Information

- a) Voyages collects, holds and uses different kinds of personal information depending upon our relationship and dealings with an individual. Generally, personal information may include (but is not limited to) name, address, telephone number, email address, details of the services and goods they have enquired about or purchased. If an individual books or purchases accommodation or touring directly from us, we may collect their payment details too which may include credit card and/or bank details.
- b) On occasion, we may also collect other personal information from an individual which is appropriate having regard to the situation. This could include:
 - i. if an individual enters or departs from our airport, licensed premises and/or other areas controlled by Voyages, we may collect images of the individual on our CCTV system;
 - ii. if an individual uses our campgrounds, we may collect their motor vehicle/caravan registration number;
 - iii. in very limited circumstances we may collect sensitive information about an individual if they are ill, injured or involved in some incident which necessitates our recording details regarding the individual or matter including personal information so as to allow us to properly investigate, process and/or report the incident to say, insurers, authorities, regulators;

- iv. if an individual or an entity associated with that individual is seeking credit from Voyages or enquiring about entering into a contract with us (e.g. lease), we may collect a range of personal information for the purpose of undertaking a risk assessment of our doing business with them. This could include an individual's business experience, their financial details, their qualifications, referees and other credit and finance related personal information;
 - v. if an individual or an entity associated with them is providing services to us or our tenants (e.g. a contractor), we may collect a range of personal information for the purpose of undertaking a risk assessment when assessing the potential engagement, for the purpose of carrying out an appropriate induction, for the purpose of carrying out work, health and safety training or for arranging lawful access to a site which we control and in particular, in relation to airside access;
 - vi. if an individual opts in and/or registers with us via our website for receiving communications and media alerts; or
 - vii. if an individual is applying for employment with Voyages, we may collect personal information about them in relation to the recruitment process (e.g. their resume, date of birth, qualifications, skills, work history, residency status and sensitive information from health records, Work Cover claims and pre-engagement health and medical assessments. In the case of indigenous trainees, this may include personal information relating to their indigenous heritage).
- c) We usually collect personal information directly from the individual involved however we may also collect personal information about them from a third party or other sources (e.g. an airline, from public records, recruitment agency or business partner).
- d) If an individual or third party provides us with personal information about another individual, the party providing the personal information warrants and represents to Voyages, and we collect it on the basis that they have obtained individual's consent for Voyages to collect, hold and use that personal information in accordance with this Privacy Policy.
- e) When collecting personal information, we will always take reasonable steps to provide the individual with details as required under the Privacy Act. This includes the purpose of collection, who we disclose the personal information to, any law that requires or authorises us to collect the information and wherever reasonably practicable to do so, the main consequences if we do not collect personal information we are requesting. If we collect personal information from another source i.e. from someone other than the individual involved, wherever practical, we take reasonable steps to ensure the individual involved is made aware of the fact and circumstances of that collection.
- f) Generally, if we are unable to collect the personal information we require for a particular purpose, we may not be able to provide the individual with the product or service which they are wanting from us. Furthermore, if the information provided is incorrect or incomplete, this may also prevent, limit or otherwise affect our ability to provide the product or service.

5.2 Purposes for which Personal Information is collected, held, used and disclosed

- a) Voyages will only ever use personal information for lawful purposes. Furthermore, we only use and disclose personal information with consent and for the purposes for which we collected it, which would include the primary purpose and in some cases the 'related' or 'secondary' purposes, but only where the owner would reasonably expect their personal information to be used for such related or secondary purposes.
- b) Examples of purposes for which we could collect personal information include:
- i. General Purposes:
 - 1. General purposes for which we use personal information include to:
 - a) Develop, improve, manage and administer Voyages' and/or our business partners' products, services and processes;
 - b) Keep in contact with you at your request for example, so as to deal with any feedback (including complaints), return any lost property etc.;
 - c) Maintain a business relationship which we have with you;

- d) Maintain Voyages' business records as required by law and/or good business practices, which may include insurance, tax and other lawful purposes such as managing insurance claims and managing contracts;
 - e) Allow us to run our business and perform administrative and operational tasks such as training staff, risk management, systems review, development and testing (e.g. websites and other online channels), undertaking planning, research, statistical analysis, for improving our customer services and for carrying out any purpose and related purpose for which you have given your consent.
- ii. Safety, Operations, Emergency and Security purposes:
1. We also use personal information including that collected by our Electronic Monitoring Systems (e.g. CCTV, access systems, swipe systems) for security, operational safety and emergency purposes including to:
 - a) Detect, deter and respond to criminal or unlawful activity or suspicious, inappropriate or unauthorised activity in our operations including our airport;
 - b) Monitor and manage the safety and security of our operations including in relation to resort and airport users, staff and for conducting investigations;
 - c) Monitor emergencies and incidents so as to properly manage our response, reports, reviews and investigative activities;
 - d) Monitor and maintain security including our guest areas' and airport security; and
 - e) Monitor and manage operations including guest experience enhancement, guest traffic flow, passenger and aircraft facilitation and access to our facilities and infrastructure including resorts, airport, roads, car parks, shops, and retail facilities.
 2. We also use personal information collected by other means for security and operational purposes relating to:
 - a) Issuing and maintaining resident, resort and airport authorities, licenses, passes, and permits including Residents Pass, Authority to Drive Airside, ASICs and Employee access cards;
 - b) Maintaining records that are required for security including aviation purposes including audits, CASA requirements, Office of Transport Security requirements, Northern Territory Government requirements and CAGRS records;
 - c) Recording, investigating and analysing emergencies, near misses, actual or potential incidents or issues relating to Voyages' operations; and
 - d) Maintaining and managing our business operations relating to our resorts and airport safety and security e.g. guest and passenger identification, screening of passengers, monitoring and managing access to public and secure areas within our resorts and our airport.
- iii. Marketing Purposes:
1. Voyages uses personal information for marketing purposes so as to improve our customer service and to improve our own and our business partners' financial performance. To this end, we use personal information in the following manner:
 - a) When you participate in our marketing activities such as our promotions, subscribe to e-newsletters or purchase a product or service like resort accommodation or touring, you consent to us using personal information including your name, email address and preferences for further marketing purposes;
 - b) We will use your personal information to let you know about our tourism products and services, special offers, promotions, opportunities, products, services or benefits that are being offered by us, any of our business partners, airline partners and tour operators and which we think that you may be interested in. We may also wish to obtain your opinion about our or our business partner tour and flight offerings or information about how you use them via research or surveys;

- c) We promote our businesses and undertake analysis to provide you with targeted products and/or services which we think may be of interest to you given your previous dealings with us;
- d) We may conduct these marketing activities via direct mail, email, telephone, SMS or any some other means. We may also market our products or services to you through third party channels (such as social media and/or networking sites) and/or based on your use of our products or our business partners' products; and
- e) We will always advise you of your ability to, and allow you to "opt out" from receiving our marketing offers. Specifically, you will always be given the option to unsubscribe from e-newsletters and other marketing or promotional material sent by us or our business partners. Where practical, you will be able to choose to "opt out" of particular marketing or all marketing. If there is an issue with the "opt out" process, if you simply email us with your request, we will promptly remove you from the marketing. In either case, we will always process your 'opt out' request as soon as is practicable after we receive your request.
- f) Voyages may disclose personal information we hold to Voyages' agents, business partners and contractors for any lawful purpose including any of the purposes set out above. This may include for the purposes of those parties providing services to us or performing business services or functions on our behalf (e.g. our contractors, our service providers, ICT service providers, marketing service providers, our insurers and professional services providers etc.). At all times, those contractors, service providers and agents will manage your personal information pursuant to this Policy.
- g) Notwithstanding any of the above:
 - i. Voyages will not sell personal information to any third party;
 - ii. Voyages may in some cases use and disclose personal information for purposes other than the purposes for which it was collected (including related or secondary purposes), but only where it has obtained the owner's consent to do so; and
 - iii. Voyages will only use and disclose personal information for lawful purposes and/or where such use and disclosure required by law.

5.3 Sensitive Information

- a) Sensitive information is a special type of personal information under the Privacy Act and there are strict obligations in relation to the management of any sensitive information which we collect. Voyages will only ever collect sensitive information for a lawful purpose and/or with an individual's consent. Unless an individual or their representative/agent advises us otherwise in writing at the time of providing the sensitive information to us, Voyages accepts the sensitive information strictly on the basis that the individual is providing it and consenting to it being held and managed by Voyages in accordance with this Policy and the Privacy Act.

5.4 Storage and security of personal information

- a) So far as storage and security of personal information is concerned:
 - i. Voyages stores personal information in various forms which may include electronic and/or hard form;
 - ii. Voyages will always take reasonable steps to securely store personal information to ensure it is protected from unauthorised access, modification, unauthorised disclosure as well as other types of misuse and interference;
 - iii. Financial details, including credit card details and related personal information gathered in the process of conducting an online transaction from our website or a call centre transaction are only used for credit card authorisation purposes and the information is

- shared only with our payment processing provider in connection with your purchase. Any online purchases are conducted using 256 bit encryption and other usual, business appropriate security measures to ensure the protection of the information;
- iv. We take reasonable steps to destroy and/or permanently de-identify personal information when we no longer require it for a purpose for which it was collected. We may retain personal information for as long as necessary to comply with any law, for insurance purposes, as required by good corporate governance purposes, for the prevention of fraud or in relation to any ongoing dispute (whether with the individual or not). In addition to these matters, personal information may also be retained in our IT system back-up records which will always be securely held in accordance with legal requirements and/or good business practices; and
 - v. It is recognised that transferring data over the internet has inherent risks associated with it notwithstanding reasonable preventative measures having been taken and put in place to mitigate such risks. Accordingly, Voyages cannot and does not guarantee the security of personal information during electronic transmission to us including via any Voyages website. Individuals need to be mindful of these risks when considering transmitting personal information to us over the internet.

5.5 Sharing Your Personal Information

- a) Voyages only ever discloses personal information to other individuals or organisations for the purpose for which it was collected, with consent or as permitted by law.
- b) We may disclose personal information to those parties involved in providing, managing or administering the product or service that we are providing to that individual. This could include:
 - i. Organisations involved with us in our payment systems including merchants, banks, payment organisations and tolling organisations in the case of airline transactions;
 - ii. Organisations involved in our business practices including our business partners, agents and contractors e.g. security contractors, contractors and debt collectors;
 - iii. Organisations with whom we have alliances or business arrangements with for the purposes of promoting our respective products or services e.g. airlines, tour operators and service providers;
 - iv. Organisations that maintain, review and develop our business systems, procedures and technology infrastructure e.g. ICT service providers;
 - v. Our tenants and licensees e.g. airlines, transport operators; touring operators; and
 - vi. Professional advisors e.g. accountants, auditors, insurers and lawyers.
- c) We may also provide personal information to various parties who are authorised by law to receive it. These may include:
 - i. Enforcement agencies e.g. the Australian Federal Police, Territory/State Police, Customs, Attorney General's Department, Immigration Departments; and
 - ii. Entities or regulatory bodies conducting audits, reviews, investigations or managing claims or disputes e.g. Northern Territory Government, CASA, Air Services Australia, Comcare, Comcover and any Court having Jurisdiction over us.

5.6 Access and Correction of Your Personal Information

- a) An individual may at any time:
 - i. lodge a request to correct personal information about themselves that we hold if they believe that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. To do this, please contact the Voyages Privacy Officer (details below); or
 - ii. request that Voyages provide them with access to the personal information which Voyages holds about them. Generally, we will provide the access, except in very limited circumstances where the Privacy Act or some other law prohibits us from providing the access. Grounds for refusing a request could include that it will unreasonably affect someone else's privacy or where the granting of the access could pose a serious threat to someone else's life, health or safety.
- b) Where such a request is made, it must be in writing and directed to Voyages' Privacy Officer (details below). Under the Privacy Act, we are permitted to charge the individual making the

request a reasonable fee for providing access to their personal information. Usually, no fee will be charged for requesting access, and if the individual's request for access is accepted, Voyages will inform them of the fee (if any) that will be payable for providing access if the individual proceeds with the request. Any access fee payable will be dependent on the complexity of the request, how resource intensive the request is to satisfy and whether Voyages will be incurring third party costs in providing the access requested.

- c) An individual may also ask Voyages to inform them of the source of any personal information that we hold about them that we have collected from a third party. We will usually provide this except in limited circumstances where the Privacy Act or some other law prohibits us from providing details of the source to them.

5.7 Voyages and Third Party Websites

- a) Voyages uses a number of third party websites in the conduct of our business. Voyages' websites use "cookies" in their operation and in a manner common to similar websites. Voyages does not use the information stored in those cookies to collect information about the individuals who visit the websites nor the computer used. The cookies are used for statistical purposes and to assist with the efficient use and enjoyment of the website. Voyages may also collect click-stream data when individuals use the websites, such as the date and time of the visit, the pages accessed, the IP address, the type of browser and operating system used and the websites they come from and move to. This information is collected for statistical purposes only and to assist us to find out how our website is used and navigated and to improve the performance of our website.
- b) Voyages' websites may on occasion contain links to third party websites. Whilst those third party websites are operated by reputable business partners of Voyages, we are not liable nor responsible for the privacy, security or handling of an individual's personal information via those other websites. As such, individuals should review the privacy policy and terms of use for those third party websites each time they visit them.

5.8 Making a Complaint Relating to Privacy

- a) An individual may lodge a complaint with Voyages if at any time, they believe that Voyages has handled their personal information other than in accordance with the Privacy Act. To do this, please contact Voyages' Privacy Officer in writing providing details of your complaint.
- b) Voyages will confirm receipt of the complaint and set out the time frame we require to investigate the complaint and provide a response. We will endeavour to respond as quickly as possible to any complaint received and generally, this will be within 14 days of receiving the complaint.

5.9 Changes to Voyages' Privacy Policy

- a) Voyages may amend, modify or replace this Privacy Policy at any time. As such, individuals should review the Voyages' Privacy Policy each time they visit one of our websites or provide us with personal information.

5.10 Contacting Voyages in relation to Privacy including to make a Privacy related Complaint

- a) If an individual would like further information about the way Voyages manages personal information or has a privacy-related complaint, please contact Voyages' Privacy Officer as follows:

Voyages Privacy Officer
C/- Company Secretary
Voyages Indigenous Tourism Australia

Level 9, 179 Elizabeth Street
Sydney 2000
Australia
Telephone: (02) 8296 8000
Email: privacy@voyages.com.au

5.11 Office of the Australian Information Commissioner

- a) If an individual requires more information about their rights and Voyages' obligations in relation to privacy or personal information, we suggest that you review the very useful information made available by the Office of the Australian Information Commissioner at www.oaic.gov.au.