

Privacy Statement

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Online Travel Direct is committed to our client's privacy and security and to taking steps designed to secure your personal and financial information. We believe your private details should be kept just that and when you share personal information with us, we will make all reasonable endeavours to keep your details secure and private. We are committed to ensuring that your personal information is protected.

Our Privacy Policy

Online Travel Direct understands that privacy is important to you and wants your experience when dealing with us to be as enjoyable and safe as possible. This policy describes who Online Travel Direct is and how it handles your personal information generally as well as when you use our website.

The type of personal information we collect and hold

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. Generally Online Travel Direct does not collect sensitive information about you such as details of your race, political beliefs, religion or health. However, depending on the products and service you ask us to provide, we may be required to collect some sensitive information when we are providing you with specialised services (such as access requirements for a disability).

We will ask for a broad range of personal information which is necessary for us to provide you with our services. The type of personal information we ask for will depend on which of the travel products with Online Travel Direct you book on and the type of product or service you choose.

If we are not able to collect personal information about you, we may not be able to provide you with the products, services or assistance you require. The collection use or disclosure of your personal information is needed to provide these.

We will generally ask for the following types of personal information:

- name, address, email and contact details;
- date of birth;
- gender; and/or
- information about your use of our product or service

Depending on the product or service you choose, you may also be asked other types of personal information such as:

- insurance- travel
- Passport number
- Credit card details

Ways we collect your personal information

We collect your personal information:

- by using written forms;
- through contact over the telephone, your mobile or other messaging technology;
- via the internet, including websites and social media; and/or
- in person to person contact
- Through subscription and entry forms
- Booking forms and requests for further information
- Emails, response devices

We will collect your personal information during the information life cycle, on an adhoc or a recurrent basis using the above methods. For example, we will collect personal information when you acquire a product or service from us, when you make changes to that product, when you enquire on our product and services or request information on our services. We will combine or link personal information we already know about you to other personal information we collect about you.

We collect your personal information:

- directly from you by written, by phone or through our online booking engine.
- from a group co-ordinator who is arranging your travel (If this is the case we request from the group leader that every member of the group has consented to them providing this Personal Information to us, in order for us to provide those products and services).
- from other persons or organisations (including related and third parties).

Please refer to “Parties to whom we disclose and collect your personal information” section which details the types of organisations we disclose your personal information to and collect your personal information from.

Cookies

Our websites rely on "cookies" to provide several services to you. A cookie is a piece of data that a website sends to your browser and which is then stored on your computer or other internet enabled device. Cookies are generally one of two types, a session cookie or a persistent cookie. A session cookie is a temporary cookie that is placed on the device and remains until you leave one of our websites. A persistent cookie will remain on your device for a period or duration specified in the cookie despite you leaving our websites.

Cookies generally allow our websites you are browsing to interact more efficiently with your device. Online Travel Direct uses cookies to collect and use information for a range of purposes, including; to maintain and improve the operation of our websites; track user preferences and product requirements to customise our websites and target and improve advertising or marketing relevance. We may also have an arrangement with third parties who may use our cookies to improve the relevance of our advertising to you on third party websites. You can use your browser settings to manage cookies. These settings may include deleting all or some cookies, not accepting any cookies or being notified when cookies are being used.

Purposes of collection of personal information

We collect your personal information so we can:

- identify you and provide you with our products and services including notifying you about new products, services and promotions from time to time.
- understand your requirements and provide you with a product or service;
- set up, administer and manage our products and services,
- get a better understanding of you, your needs, your behaviours and how you interact with us, so we can engage in product and service research, development and business strategy including managing the delivery of our services and products via the ways we communicate with you.

Sometimes we are required to collect your personal information to satisfy specific legal obligations.

Use and disclosure

We use and disclose your personal information for the purposes we collected it. Please refer to “Purposes of collection of personal information” section to understand what these purposes may be. If your personal information is subject to the Australian privacy regime, we will use and disclose your personal information for a secondary purpose related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose. In the case of sensitive information, any secondary use or disclosure will be directly related to the purpose of collection.

For example, we will disclose your personal information to third party service providers so that they can provide the contracted services to Online Travel Direct such as information technology support or programming, hosting services, telephony services, mailing or sending of documentation to customers digitally or otherwise.

As a travel portal, Online Travel Direct offers products and services on behalf of several other providers including but not limited to cruise lines and insurance companies. Online Travel Direct maybe required to disclose your Personal Information to these providers to enable them to provide you with their services and to assist in making your experience a satisfying one. As these providers require this Personal Information when making your booking, if it is not provided, we will not be able to finalise your booking.

There will be other instances when we may use and disclose your personal information in accordance with the Australian and New Zealand privacy regimes including where:

- you have expressly or implicitly consented to the use or disclosure;

Collection use and disclosure of personal information for marketing

Online Travel Direct has a large range of travel services. Marketing is an important part of our business. We want to collect, use and disclose your personal information to keep you up to date with the range of products and services available from Online Travel Direct and which we think may be of interest to you. We use a wide variety of marketing strategies including mail, SMS, telephone and other internet-based marketing including targeted online advertising and online behavioural marketing. Third party marketing service providers may combine the personal information we disclose to them with information they already hold about you, in order to serve you with more relevant advertising about our products and services.

We want you to be able to exercise your marketing preferences. Details of how to exercise your preferences can be made to our privacy officer whose contact details are below.

Parties to whom we disclose and collect your personal information

As detailed in “Ways we collect your personal information” section there are a range of people and organisations (‘parties’) to whom we disclose your personal information and collect personal information from – that are not you. These may be parties related to Online Travel Direct or third parties. The particular party will depend on which company or brand in Online Travel Direct you do business with and what product or service you receive.

Some examples of the parties to whom we may disclose your personal information to and collect personal information from are:

- other companies within the Online Travel Direct and other trading divisions or departments within the same company
- customer, product, business or strategic research and development organisations;
- a third party with whom we have contracted to provide travel services, administrative or other business services – for example:
 - information technology providers,
 - marketing agencies and other marketing service providers;
 - travel providers whose product you are travelling on;
 - print/mail/digital service providers; and
 - imaging and document management services
- data warehouses,
- social media and other virtual communities and networks where people create, share or exchange information;
- publicly available sources of information;
- clubs, associations, member loyalty or rewards program providers and other industry relevant organisations;
- any other organisation or person where you have asked them to provide your

personal information to us or asked us to obtain personal information from them, (e.g. your parent or group organiser).

Overseas disclosure

We will send your personal information overseas and collect personal information from overseas. Instances when we will do this include:

- when you have asked us to do so or we have your consent;
- when we are authorised or required by an Australian or New Zealand law or a court/tribunal to do so;
- when we have outsourced a business activity or function to an overseas service provider; and
- certain electronic transactions.

We will disclose all kinds of personal information overseas but only to the extent it is necessary to perform our functions and services. In order to engage in our business activities and functions we will disclose your personal information to and collect your personal information from parties in several countries.

Please view [here](#) to see a list of countries in which those parties are likely to be located in the United States of America, European Economic Area, United Kingdom, Japan, Philippines, India, Thailand, Fiji and New Zealand. We will need to from time to time disclose your personal information to and collect your personal information from other countries not on this list.

This will be on an adhoc or case by case basis and for the purposes for which we collected your personal information.

Security of your personal information

We hold your personal information in:

- computer systems;
- electronic databases;
- digital records;
- telephone recordings; and
- in hard copy or paper files.

These storage mechanisms may be managed in several ways. They may be managed or administered internally by a company in Online Travel Direct and may be held locally in Australia. Or they could be managed by a third-party storage provider with whom Online Travel Direct has a contractual relationship and be either managed locally and/or overseas.

We will take all reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- restricting electronic and physical access to personal information we hold;

- having in place stand-by systems and information backups to deal with major business interruptions;
- maintaining technology security products;
- requiring any third party providers to have acceptable security measures to keep your personal information secure; and

We maintain industry standard technology and procedures in respect of our information management and provision of online services. Online Travel Direct has an ongoing program of review and enhancement of its security measures. The reviews and updates address such matters as security and information management policies, processes and procedures, and technology reviews such as software, virus protection and fire wall settings. Online Travel Directs' systems and information technology infrastructure are regularly audited both by internal and external experts.

E-mail transmissions to Online Travel Direct, are not necessarily secure. If you have any concern about the security of the contents of your e-mail or any other transaction over the Internet, then you should consider contacting us by other means. Online Travel Direct does however employ strong encryption techniques and the use of firewalls similar to financial institutions and internet transaction systems globally.

If you make a transaction involving the submission of personal information over the Internet to Online Travel Direct using one of our online forms, then the Online Travel Direct employs that encryption technology. Once Online Travel Direct has received your personal information, it is stored and protected by a range of security controls, including firewalls, user identification requirements and audit trails.

Online Travel Direct trains its employees and representatives in their privacy obligations, applies confidentiality obligations and provides authorised persons with user identifiers, passwords or other access codes to control access to your personal information.

Non-customers

You may not be a customer of ours, but you may interact with one of our companies. You may interact with one of our companies by using our transactional websites, entering a competition or commenting via social media. We will collect, use and disclose your personal information in accordance with this Privacy Policy and any Privacy Statement you may receive when you interact with us. Please see our Online Terms found on our transactional websites for more information about interacting with us via the Internet.

Anonymity and Pseudonymity

If you are subject to the Australian privacy regime, you have the option of not identifying yourself or of using a pseudonym unless we are required or authorised under Australian law or a court/tribunal to identify you or it is impracticable to deal with you anonymously or by a pseudonym.

Australia - Access and Correction of Personal Information

You have the right to request access to personal information we hold about you. We can deny access to some or all of your personal information in specified circumstances. We will provide reasons for any refusal in writing.

If you would like to request access to the personal information we hold about you please contact us by using the relevant Access or Correction contact in the Online Travel Direct Privacy Contact Information details, which can be found below as we may be able to provide you this information within our normal business processes.

If not, the staff member will be able to commence the privacy access request process for you which may require you to complete a privacy access request form. These requests may incur a fee and you will be advised of an estimated fee and the payment options at the time of written acknowledgement. This is usually provided to you within 5 business days.

Our response to your request will usually be completed within 30 days of receipt of the request. If we require further time, we will contact you in writing to advise of this and provide our reasons for the further time that is required.

We rely on the accuracy of the personal information we hold about you to provide our products and services to you. You have the right to request us to correct any inaccurate, out-of-date, incomplete, irrelevant or misleading personal information. We will take such steps that are reasonable in the circumstances regarding the purpose for which your personal information is held to make a correction. We may refuse to correct your personal information and will provide reasons for refusal in writing.

If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take such steps that are reasonable in the circumstances to associate that statement with all records containing the relevant information. You can contact us to request the correction to the personal information we hold about you by using the relevant Access or Correction contact in the Online Travel Direct Privacy Contact Information table below.

Australia - Complaints Handling

If you have a complaint about how we collect, hold, use or disclose your personal information or a privacy related issue such as refusal to provide access or correction, please use our complaints process so that we can help. It is important to follow the complaint handling process in order to resolve your complaint effectively and efficiently.

If you are subject to the Australian privacy regime, please note how we will deal with a complaint:

Step 1.

Let us know

If you would like to make a complaint, please let us know by contacting us. A response is usually provided to you within 5 business days by our privacy officer. You can contact us by using the relevant Complaints contact in the Online Travel Direct Privacy Contact Information below.

Step 2.

Review by our Internal Privacy team

If you are not satisfied with the outcome of the business review you can request the complaint be referred to the Management Team for review or you can contact them directly. Should additional information be required from you, we will contact you to discuss. The Management Team will usually contact you with a decision within 25 business days of receiving your complaint. You can contact the Senior Management team by using the relevant contact in the Online Travel Direct Privacy Contact Information below.

Step 3.

Seek review by an external service

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you may be able to access the services of an External Dispute Resolution Scheme such as the below.

Australia Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing
Office of the Australian
Information Commissioner
GPO Box 5218
Sydney NSW 2001
www.oaic.gov.au

Removal from our marketing lists:

If you do not want to receive email or posted offers from Online Travel Direct please let us know by sending an email message to administrator@onlinetraveldirect.com. Or if you simply follow the instructions for 'un-subscribing' included as part of Online Travel Directs' regular mail and email offers your name will be removed from the mailing list.

Changes and getting a copy of the Policy:

We encourage you to review and check our website regularly for any updates to this Privacy Policy. We will publish the updated version on this website and by continuing to deal with us, you accept this Privacy Policy as it applies from time to time. If you would like a copy of this Privacy Policy, please contact us. This policy was last updated on the 1st October 2019.

Contact Details:

If you have any questions or comments about this privacy policy or about how we handle Personal Information about you, please contact Online Travel Direct.

More Information:

If you would like further information about privacy in Australia in general, please contact the Office of the Federal Privacy Commissioner by calling 1300 363 992 or visit www.privacy.gov.au