

## CORPORATE TRAVEL MANAGEMENT PRIVACY POLICY

### 1. About this Policy

Corporate Travel Management Group Pty Ltd (ABN 52 005 000 895) (CTM) ('we', 'us', 'our') understands the importance of, and is committed to, protecting 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.

#### **Purpose**

The purpose of this privacy policy is to:

- clearly communicate how we deal with personal information
- enhance the transparency of CTM operations
- give a better and more complete understanding of the sort of personal information that CTM holds, and the way we handle that information

#### **Changes to this privacy policy**

We may change this privacy policy from time-to-time. The updated privacy will be posted on our website, with the date of the update shown.

#### **Who to contact**

If you have any questions, concerns or complaints about this privacy policy, or our use of your personal information, please contact the Privacy Officer using the contact details provided below. You can also contact the privacy officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible.

You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

CTM Group Privacy Officer: Tel +61 7 3211 2400

Email: [privacyofficer@travelctm.com](mailto:privacyofficer@travelctm.com)

### 2. Information we collect about you

We collect information about you that we reasonably need for our business functions and activities and which is required by law. Our business functions and activities include:

- Providing you with CTM travel and other products and services – these are described generally on our website, our corporate brochures, advertising, and our letter and emails and communications to customers, clients and business partners
- activities in support of those functions including administration, management, marketing, online and mobile marketing, IT, legal, security, customer support, finance (including credit control) and human resources
- activities we plan for the future including new ways of communicating, new products and services, new business models and new businesses

Generally we collect the following personal information about you:

- your name
- your contact details including residential or business address, telephone number and email address
- company details (if applicable)
- date of birth
- travel details including passport details, driver licence information and other information

We may combine your contact details above with other information about you, for example:

- we collect details related to your travel preferences including preferred travel products and services
- we keep records of your travel including service provider, travel itinerary, payment details (including credit card details) and other details;
- your employer (our business client) (If applicable);
- if your business or employer supplies us with products or services, or if your business or employer distributes, sells or services our products, we collect information about your trading with us (for example the products you buy or sell or the services you provide), your trading history and account history
- if you apply for a position with us, we collect information to help us decide your application, including your date of birth, work history and similar details
- if you request information from us (for example about a product or service) or register a complaint, we collect information about your request or complaint
- if you enter a promotion or competition, visit us at an event or enquire about CTM, we may collect your contact details so that we can follow up on your enquiry or interest by sending you marketing material.

We record this information (personal information) in our database whilst we deal with you. We will remove this information from our database when we have no further need to keep a record of it, except if we are required to keep it by law (for example, for tax or for superannuation purposes).

### 3. How we collect information about you

#### *How do we collect personal information?*

We collect personal information directly from you. We may record your contact details when you call us, when you fill out a traveller profile or other form, when you purchase a product or service, when you participate in a transaction, when you provide your contact details via web, mobile or email or when you ask us for information or request something from us.

Sometimes we collect personal information about you from another person or business, or from a publicly available source. For example:

- Your employer (our business client) may give us your details in relation to booking a travel product or service;
- if you are an employee of one of our business partners (e.g. supplier, agent or contractor), we may be given your name and contact details by your employer
- if you enter a networking event, promotion or competition organised by us, we may be given your name and contact details by the promoter of the event
- our service providers may provide us with your personal information from websites, social media sites, mobile, and other technology based sources

We use lawful and fair means to collect your information. We will collect personal information about you from another person or from a publicly available source only if it is unreasonable or impracticable to collect it directly from you, and we will take reasonable steps to inform you that we have collected your personal information. Those reasonable steps may include informing you through this privacy policy.

#### *Unsolicited information*

If we receive personal information about you that we have not requested, and if we determine that we could not have lawfully collected that information under privacy law if we had requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

### 4. Do I have to provide you with my 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:

**If you do not give us your personal information we cannot give you information about travel you (or your employer) may have booked or deal with a complaint you may have, provide you with a service or deliver a product or service to you at an address. You cannot attend one of our networking events, or enter into 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.

### **5. Why we collect personal information about you (purpose of collection)**

We collect and record personal information about you so that we can carry out our functions and activities described above. The primary purposes for which we collect your personal information include:

- so that we can provide our products and services to you and to our business clients and suppliers
- so that we can administer our dealings with you (and your employer if applicable), to provide you with information and to respond to any requests that you may have (for example, so that we can administer and provide you with travel information)
- so that we can function as a business, for example, we may collect your personal information for research, marketing or so that we can offer new products, reconcile transactions, or if you are a supplier so that we can record your dealings with us
- so that we can comply with agreements we have entered into with our suppliers and agents

We also collect your personal information for certain secondary purposes that are related to the primary purposes outlined above. Secondary purposes may include so that we can run our business efficiently, for example, so that our advisors can provide us with customer research, or so that we can use technology to automate our business and to understand how our business is performing, to allow us to operate efficiently and to lower costs by outsourcing services (such as collecting or paying money). Other secondary purposes may include so that we can sell or transfer our business or merge with another business.

## 6. Disclosure

### *Who do we disclose your personal information to?*

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

- a purpose set out in this privacy policy (primary or secondary purpose above)
- a purpose you would reasonably expect
- a purpose required or permitted by law
- 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:

- service providers including travel providers, agents, contractors, IT, security, legal, accounting, research, credit, credit reporting bodies, marketing, insurers, financial institutions and others
- our affiliate companies and related companies
- government, regulatory and law enforcement authorities, where we are required to or permitted to by law
- your employer, if you are an employee of our business client
- 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 and privacy obligations with respect to the protection of your personal information.

### *Disclosure overseas*

We may disclose your personal information to an overseas service provider, for example a travel provider, a travel product or service provider, a cloud data centre 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

- Europe
- The Americas
- Asia
- Africa

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 and confidentiality obligations.

## 7. Access to your personal information

You may request access to the personal information that we hold about you by using the contact details provided above.

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.

### **Accuracy and correction**

We take reasonable steps to make sure that the personal information we collect is accurate, up-to-date and complete. We take reasonable steps to make sure that the personal information we use or disclose is accurate, up-to-date, complete and relevant. Where we believe that the personal information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information.

You may request that we correct your personal information that we hold by contacting us by using the contact details provided above. We will take reasonable steps to correct the information to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

We will deal with your request to correct your personal information within a reasonable time. If we do not agree with the corrections you have requested, we are not obliged to alter your personal information accordingly. However, where we refuse to correct any personal information as requested by you, we will give you a written notice which sets out the reasons for our refusal.

## 8. Security

We hold your personal information in paper-based and electronic files. We will take reasonable steps to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss
- unauthorised access, modification or disclosure

This means that, in respect of our paper-based files, we maintain various security systems on our premises, and in respect of electronic files, we (or our service providers) maintain secure electronic network systems.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we ensure that it is destroyed or de-identified.

### **Website**

This section explains how we handle personal information collected from our websites (including social media site and mobile site if relevant). If you have any questions or concerns about transmitting your personal information via the internet, you may contact us using the contact details provided above, as there are other ways for you to provide us with your personal information.

### **Visiting our website**

If you access an unsecured part of our websites, that is, a public page that does not require you to log on, we (or our service providers) will collect information about your visit, such as:

- the time and date of the visit
- any information or documentation that you download
- your browser type
- your IP address

### **Cookies**

A "cookie" is a small text file which is placed on your internet browser and which we access each time you visit our website. When you visit the secured pages of our website (i.e. pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (i.e. public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies; however doing so will prevent you from access to the secured pages of our website.

### **Email**

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

### **Security**

We make reasonable efforts to ensure that the most up-to-date security measures are used on our website to protect your personal information. Any data containing personal information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

*Links on our website*

Our website may contain links to third party websites. We advise that the terms of this privacy policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

## **9. Marketing**

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We may do this, even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes. You may opt out at any time if you no longer wish to receive marketing information. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by using the contact details provided above, or by "unsubscribing" from email or other marketing messages.