

privacy policy



1. About this Policy

Corporate Travel Management Group Pty Ltd (ACN 005000895) and its subsidiaries, related bodies corporate and franchisees (collectively referred to in this document as 'CTM', 'we', 'our' or 'us'), understands the importance of, and is 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.

Purpose

The purpose of this privacy policy is to:

- Clearly communicate how we deal with personal information;
- Enhance the transparency of CTM operations; and
- Provide a better and more complete understanding of the sort of personal information that CTM holds, and the way we handle that information.

How to contact us

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

CTM Head Office: Tel +61 7 3211 2400

Email: customerservicectm@travelctm.com

Once a complaint has been lodged, we 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

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 travel services and related products – these services and products are described generally on our websites, our corporate brochures, advertising, our letters, emails and communications to customers, clients and business partners;

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- Activities in support of those functions including administration, management, marketing, IT, legal, security, customer support, finance (including credit control) and human resources; and
- Activities we plan for the future including new ways of communicating, new products and services, new business models and new businesses.

We may collect the following personal information about you:

- Your name;
- Your contact details, including residential or business address, telephone number and email;
- Company details (if applicable);
- Date of birth;
- Payment information; and
- Travel-related details including passport details, frequent flyer details, drivers licence and other similar information;

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

- Details related to your travel preferences including preferred travel products and services;
- 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; and
- 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(s) whilst we deal with you. We will delete or de-identify 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 legislative purposes).

3. How we collect information about you

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Generally, 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; and
- 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:

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- We cannot give you information about travel you (or your employer) may have booked or deal with a complaint you may have; and
- We cannot 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:

- Providing travel and related products and services to you and to our business clients and suppliers;
- Administering 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 purposes that allow us to run our business efficiently, for example, performing customer research, using technology to automate our business and to understand how our business is performing, or to allow us to operate efficiently and to lower costs by outsourcing services (such as collecting or paying money). Other secondary purposes may include enabling us to sell or transfer our business, or to merge with another business.

6. Disclosure

We will 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, researchers, credit providers, credit reporting bodies, marketers, insurers, financial institutions and others;
- Our affiliates 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; and
- 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 details provided in the 'How to contact us' section.

7. Access to and correction of your personal information

Access to Information

You may request access to the personal information that we hold about you by using the details provided in the 'How to contact us' section.

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 of Information

We take reasonable steps to make sure that the personal information we collect, 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 in the 'How to contact us' section. 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. 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 in order to protect your personal information, and regularly review these systems and procedures.

9. Websites

This section explains how we handle personal information collected from our websites (including e-commerce sites, social media sites and mobile sites 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 in the 'How to contact us' section, as there may be other ways for you to provide us with your personal information.

Visiting our website

When you access online information or services via one of our websites, we (or our service or hosting providers) will collect information about your visit, such as:

- The time and date of the visit;

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- Any information or documentation that you access or download;
- Your internet browser type and the type of device used; and
- Your IP address.

Cookies

A 'cookie' is a small text file which is stored within your computer or browser, which we access each time you visit our website. We may link the information we store in cookies to any personal information you submit while on our website.

Cookies save data about individual visitors to the website, such as the visitor's name, password, username, screen preferences, the pages of a site viewed by the visitor, and the advertisements viewed or clicked by the visitor. We may use cookies to identify a visitor's browser, to anonymously track visits or to enhance the experience of the website.

You may change the settings on your browser to block or reject cookies, or delete our cookies, however, doing so will prevent you from accessing certain areas or features of our website.

Google Analytics

When you visit our website, Google Analytics, a service provided by Google, Inc. ('Google'), may place persistent cookies on your computer's browser. The information generated by the cookies about your use of the website is transmitted to Google. This information is then used for the purpose of compiling statistical reports, such as enabling us to measure and analyse the number of visits to the site and its pages, the average time spent on the site or the pages viewed. We do not use Google Analytics to track or to collect any personal data of visitors to our website. We will not associate any data gathered via use of cookies with any personal data from any source as part of our use of Google Analytics.

For further information about Google Analytics, please visit: www.google.com/analytics

For details of Google's Privacy Policy, please visit:

<http://www.google.com/intl/en/ALL/privacypolicy.html>

For details on how to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on, please visit:

<https://tools.google.com/dlpage/gaoptout/>

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

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which is was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

Website 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. We will delete or de-identify your information from our websites, applications or databases 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 legislative purposes).

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, we encourage you to obtain a copy of their privacy policy as their policies and practices may differ from ours.

10. 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 also provide your details to other organisations for specific marketing purposes.

Opt-Out

Should you no longer wish to receive marketing information including emails, e-newsletters or other promotional material, participate in market research or receive other communications from us, you may opt-out at any time.

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 in the 'How to contact us' section, or by using the 'unsubscribe' feature present in our emails or other marketing messages.

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.