

Andcar Pty Ltd - Privacy Policy

1. Background

This Privacy Policy ("Policy") sets out how Andcar Pty Ltd (ACN 054 904 719) through its trading names / brands (including Wildlife Safari Consultants / Journeys Unlimited / Madagascar Travel Centre) protects the privacy of your personal information.

We need to collect, use and disclose personal information in order to perform our business functions and activities, including making and managing travel bookings on behalf of our customers. We are firmly committed to protecting the privacy and confidentiality of personal information and to maintaining various physical, electronic and procedural safeguards to protect personal information in our care.

By providing personal information to us (either directly or allowing another person to do so on your behalf), you agree that this Policy will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as detailed in this Policy. If you do not agree with any part of this Policy, you must not provide your personal information to us. If you do not provide us with your personal information, or if you withdraw a consent that you have given under this Policy, this may affect our ability to provide services to you or negatively impact the services we can provide to you. For example, most travel bookings must be made under the traveller's full name and must include contact details and appropriate identification (e.g. passport details). We cannot make bookings for you without that information.

There may be instances where your local data protection laws impose more restrictive information handling practices than the practices set out in this Policy. Where this occurs we will adjust our information handling practices in your jurisdiction to comply with these local data protection laws.

2. What personal information do we collect?

Personal information has the meaning given under your local data protection law. Personal information generally means information which relates to a living individual who can be identified from that information, or from that information and other information in a person's possession, including any expression of opinion, whether true or not, and whether recorded in material form or not, about an identified or reasonably identifiable individual, and any indication of intention in respect of an individual.

Generally, the type of personal information we collect about you is the information that is needed to facilitate your travel arrangements and bookings and to arrange travel related services and/or products on your behalf. For example, we may collect details such as your name, residential/ mailing address, telephone number, email address, credit/debit card details (including card type, card number, security number and expiry date), passport details, loyalty program / frequent flyer details, information about your dietary requirements and health issues (if any), and other details relevant to your travel arrangements or required by the relevant travel service provider(s) (e.g. airlines and accommodation or tour providers).

We will only collect sensitive information in compliance with your local data protection laws, with your consent and/or where it is reasonably necessary for, or directly related to, one or more of our functions or activities (e.g. to make travel arrangements), unless we are otherwise required or authorised to do so by law. To the extent permitted or required under your local data protection laws, you consent to us using and disclosing your sensitive information for the purpose for which it was collected, unless we subsequently receive your consent to use it for another purpose. For example, if you provide health information to us in connection with a travel insurance application you would like to make, you consent to us using and disclosing that health information in connection with arranging that travel insurance on your behalf. We will not use sensitive information for purposes other than those for which it was collected, unless we subsequently receive your consent to use it for another purpose.

3. How do we collect personal information?

We will collect personal information directly from you unless it is unreasonable or impracticable to do so. Generally, this collection will occur when you deal with us either in person, by telephone, letter, facsimile or email. In some circumstances, it may be necessary for us to collect personal information about you from a third party. This includes where a person makes a travel booking on your behalf which includes travel arrangements to be used by you (e.g. a family or group booking or a travel booking made for you by your employer). Where this occurs, we will rely on the authority of the person making the travel booking to act on behalf of any other traveller on the booking. By providing your personal information to us, either directly or through a family member, employer or other agent or representative in connection with a travel booking or related service, you will be deemed to have consented to your personal information being collected by us and used and disclosed in accordance with this Policy.

Where you make a travel booking on behalf of another person (e.g. a family or group booking or a travel booking made for an employee), you agree you have obtained the consent of the other person for Andcar Pty Ltd to collect, use and disclose the other person's personal information in accordance with this Policy and that you have otherwise made the other person aware of this Policy.

You should let us know immediately if you become aware that your personal information has been provided to us by another person without your consent or if you did not obtain consent before providing another person's personal information to us.

4. When we act as agent for a travel service provider

When we book and otherwise arrange travel related products and services for you, we usually do so as agent for or on behalf of travel service providers. In this case, we usually collect personal information about you both for our internal purposes as described in this Policy, including the purpose of us processing your booking, and for the travel service provider for whom we act as agent for their internal purposes (e.g. to provide you with the booked services). As an agent, all bookings are made on your behalf subject to the terms and conditions, including privacy policy, imposed by these travel service providers. We will provide you with copies of all relevant travel service provider terms, conditions and privacy policies on request.

Accordingly, you are deemed to consent to the collection, use and disclosure of your personal information by us to the relevant travel service providers, and the use and disclosure of your personal information by the relevant travel service providers, for the purposes set out in this Policy and, to the extent permitted under your local data protection laws, for other purposes specified in their privacy policy. For example, if you book a flight through us, then under this Policy you consent to us collecting your personal information and disclosing that information to the airline to enable your flight to be booked and for the airline to provide the flight service to you, and, to the extent permitted under your local data protection laws, for other purposes specified in their privacy policy.

5. How do we use and disclose your personal information?

Where you contact us in relation to a travel booking or query, the primary purpose for which we collect your personal information is generally to provide you with travel advice and/or to assist you with booking travel and/or travel related products and services.

By continuing to use our services and/or by providing us with personal information (or allowing another person to do so on your behalf), you consent to us using and disclosing your personal information for the purpose for which it was collected, and, where permitted by your local data protection laws, for any related secondary purpose which we believe you would reasonably expect.

The purposes for which we collect personal information, and those secondary purposes which we consider to be directly related, include:

- identification of fraud or error;
- regulatory reporting and compliance;

- internal accounting and administration;
- to comply with our legal obligations and any applicable customs/immigration requirements relating to your travel; and
- other purposes as authorised or required by law (e.g. to prevent a threat to life, health or safety, or to enforce our legal rights).

Promotional/marketing material

Where permitted by local data protection laws, we may use your personal information to send you marketing activities relating to our products and services that we think may interest you, unless you have requested not to receive such information. These may include, but are not limited to, mail outs and emails.

6. Is personal information disclosed to third parties?

We may disclose your personal information to third parties, as set out below, and in accordance with your local data protection laws. By continuing to use our services and/or by providing us with your personal information (or allowing another person to do so on your behalf), you consent to that personal information being processed, transferred and/or disclosed by us for the purpose for which it was collected and, where permitted by your local data protection laws, for any related secondary purpose which we believe you would reasonably expect. Note that, in this Policy, where we say “disclose”, this includes to transfer, share (including verbally and in writing), send, or otherwise make available or accessible your personal information to another person or entity.

Your personal information may be disclosed to the following types of third parties:

Our contractors, suppliers and service providers, including without limitation -

- travel service providers such as travel wholesalers, tour operators, airlines, hotels, car rental companies, transfer handlers and other related service providers;
- a person making your travel booking on your behalf, where you are travelling on a booking made on your behalf by another person (for example, a family member, friend or work colleague);
- as required or authorised by applicable law, and to comply with our legal obligations;
- customs and immigration to comply with our legal obligations and any applicable customs/immigration requirements relating to your travel;
- government agencies and public authorities, to comply with a valid and authorized request, including a court order or other valid legal process;
- various regulatory bodies and law enforcement officials and agencies, including to protect against fraud and for related security purposes; and
- enforcement agencies where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter.

Other than the above, we will not disclose your personal information without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety of an individual or to public health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), or where such disclosure is authorised or required by law (including applicable privacy / data protection laws).

7. Is personal information transferred overseas?

We may disclose your personal information to certain overseas recipients, as set out below, which we will do in accordance with your local data protection laws.

It is possible that information will be transferred to an overseas recipient located in a jurisdiction where you will not be able to seek redress under your local data protection laws and that does not have an equivalent level of data protection as in your jurisdiction. To the extent permitted by your local data protection laws, we will not be liable for how these overseas recipients handle, store and process your personal information. By providing your personal information to us for the purpose of booking and otherwise arranging travel related products and

services for you, you consent to our disclosure of your personal information to these overseas recipients for that purpose.

* Travel service providers located overseas

In providing our services to you, it may be necessary for us to disclose personal information to relevant overseas travel service providers. We deal with many different travel service providers all over the world, so the location of a travel service provider relevant to your personal information will depend on the travel services being provided. The relevant travel service providers will in most cases receive your personal information in the country in which they will provide the services to you or in which their business or management is based.

8. Security of information

Andcar Pty Ltd has implemented various physical, electronic and managerial security procedures in order to protect the personal information it holds from loss and misuse, and from unauthorized access, modification, disclosure and interference.

We will destroy or de-identify personal information once we no longer require it for our business purposes, or as required by law.

9. Access to and correction of personal information

You are entitled to access any personal information we may hold about you in accordance with your local data protection laws. Where personal information we hold about you is not accurate, complete or up-to-date or the information is irrelevant or misleading, you may ask us to correct that personal information, and we will respond to your request within a reasonable time. We reserve the right to confirm the identity of the person seeking access or correction to personal information before complying with such a request. We reserve the right to deny you access for any reason permitted under applicable law.

You must always provide accurate information and you agree to update it whenever necessary. You also agree that, in the absence of any update, we can assume that the information submitted to us is correct, unless we subsequently become aware that it is not correct.

10. Feedback / Complaints / Contact

If you have any enquiries, comments or complaints about this Policy or our handling of your personal information, please contact your consultant or contact us at:

Attention: The Managing Director – Andcar Pty Ltd

Address: P.O. Box 6657, Frenchs Forest 2086 N.S.W.

Telephone: +61 2 9939 5660

Email: admin@wildlife-safari-consultants.com

We will respond to any enquiries or complaints received as soon as practicable.