

## Your Online Privacy

Sun Island Tours is committed to providing you with the highest levels of customer service. This includes protecting your privacy. We are bound by the Commonwealth Privacy Act 1988, which sets out a number of principles concerning the protection of your personal information.

This statement, called "Your Online Privacy", sets out important information about privacy protections which we extend to your personal information. It relates to personal information that you provide to us through our Websites (e.g. when you subscribe to our services online) and which we collect from other sources.

In summary, this policy explains:

- how we collect and use your personal information;
- your right of access to your personal information;
- your right to inspect and, where necessary, correct the personal information that we hold about you;
- your right to have your privacy complaints investigated and resolved; and
- your right to have your personal information protected from misuse or unauthorised access.

We will take reasonable steps to protect the privacy of the personal information that we collect and use. This policy applies to all users of our services who provide us with their personal information and all information that is collected by us, however does not apply to our employees who provide us with their personal information.

### **What is personal information?**

Personal information is any information that can be used to identify you. This includes any personal information or opinions about you, whether true or not, no matter how the information or opinions are recorded.

### **Why and how we collect personal information**

Sun Island Tours collects your personal information in order to provide you with and enhance our services, or to give improved access or functionality to our Websites.

### **Sun Island Tours collects personal information in a number of ways, including:**

- directly from you, such as when you enter your personal details on our Websites (e.g. during registration or application for products and services), if you apply to access certain areas of our Websites or you apply to use our services or publications we may ask you to register your personal details with us. For example, we may collect your name, age and date of birth, gender, email address, telephone/mobile number, fax number, country of residence, current and previous addresses, bank account or credit card details, your Sun Island Tours username and password;
- directly from you when you visit the publicly available parts of our Websites, we or the Website Hosting Provider used by us may collect your IP address, your top level domain name, the date and time of your visit, the pages you access, the previous website you visited and the type of website you use;
- directly from you, when you provide information (such as an email address and personal details) by sending us a message, email, phone or in documents such as an application form;
- from third parties such as our related companies, travel agents, credit reporting agencies or your representatives;

- information collected and collated from publicly available sources, including search engines, websites, social media, publicly available data bases, third party sources and referees, personal contacts and industry connections;
- from our own records of how you use your Sun Island Tours services.

If you choose not to provide personal information, we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

### **How we use your personal information**

Your personal information may be used to:

- identify you and to assist you to subscribe to our Website services more easily;
- provide the services you require;
- administer and manage those services, including charging, billing and collecting debts;
- gain an understanding of your information and communication needs in order for us to provide you with better, more personalised services that are tailored to your needs;
- inform you of ways the services provided to you could be improved;
- conduct appropriate checks for credit-worthiness and for fraud;
- research and develop our services using third party services;
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- inform you of matters about which we believe you may have an interest;
- notify you of our service offerings from time to time; and
- provide or potentially offer our services, provide information about our services, perform our administrative and marketing operations, comply with legislative and regulatory requirements, consider any application, direct marketing by us or our related companies, conduct market research or customer satisfaction research and identify services that may be of interest to you.
- We may use your name and general country location to support and advertise testimonials and comments that you have provided to or about us (on websites like trustpilot.com or otherwise).

We will not use your personal information for any purpose which is not related to services we provide or may offer to you or to the functionality of our Website. We will not use your personal information in a manner contrary to this policy.

### **Cookies**

If you use our Websites or any online facility we confirm that we may utilise tracking software and cookies. Cookies are pieces of information that a web site can transfer to an individual's computer hard drive for record keeping and allows websites to recognise a user's device. A cookie will contain the name of the internet location (the domain) from which the cookie has come from and the lifetime of the cookie (a cookie will usually expire after a period of time). Cookies can make using our websites easier by storing information about your preferences on a particular website. This will enable you to take full advantage of the services we offer. The use of cookies is an industry standard and you'll find most major websites use them.

Two types of cookies may be used on our websites:

- Session cookies which are temporary cookies that remain in the cookie file of your browser until you leave the site; and

- Persistent cookies which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

#### *Session cookies*

We use session cookies to allow you to carry information across pages of our site and avoid having to re-enter information.

#### *Persistent cookies*

We may use persistent cookies:

- from time to time to help us recognise you as a unique visitor when you return to our Websites and to monitor your use of our Websites;
- to allow us to link you to any of our partners or affiliates should you come to our Websites through a paid advert or banner on a website of an affiliate or partner.

Most Internet browsers are pre-set to accept cookies. If you prefer not to receive cookies, you can adjust your Internet browser to disable cookies or to warn you when cookies are being used.

#### **Use of web beacons and other tracking software**

Some of our web pages may contain web beacons which allow us to count users who have visited web pages. Web beacons collect only limited information including a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. These beacons do not carry any personally identifiable information and are used to track the effectiveness of a particular marketing campaign.

#### **When we disclose your personal information**

Your personal information is also collected to promote and market to you other services provided by third parties which we consider may be of interest to you. Before we do so, we will provide you with an opportunity to give us permission to send you marketing or promotional material (such as promotional email offers), via an opt-in mechanism. That is, we will send you such material only if you elect to receive it or if it is provided to you in response to your request. You may also notify us at any time that you do not wish to receive marketing or promotional material by calling us on 1300 665 673.

We will use and disclose information for the primary purpose for which it was collected. We may also use and disclose personal information for purposes that are related or ancillary to the main reasons we collect it. For example, we may use your personal information for the purpose of providing you with information about other services offered by us. We may also be required, by law, to disclose personal information to law enforcement officers or other persons.

For the purposes set out above (under "How we use your personal information") we may disclose your personal information to organisations outside Sun Island Tours. Where appropriate, these disclosures are subject to privacy and confidentiality protections. The organisations to which we usually disclose information include:

- your representatives (eg your authorised representatives or legal advisers);
- credit-reporting and fraud-checking agencies; our professional advisers, including our accountants, auditors and lawyers;

- government and regulatory authorities and other organisations, as required or authorised by law;
- organisations involved in:
  - a transfer/sale of all or part of our assets or business (including accounts and trade receivables);and
  - managing our corporate risk and funding functions; and
- our related companies.
- We may also engage third party contractors to perform services for us, which may involve the contractor handling personal information we hold. In these circumstances we prohibit the third party contractor from using personal information about you except for the specific purpose for which we supply it.

## **Direct Marketing**

We never disclose personal information that we collect to a third party for the purpose of allowing them to direct market their products and services unless you have given us your permission for us to do this.

*By accepting our services you expressly permit us and the Sun Island Tours group of companies to use your personal information for our direct marketing purposes and the purposes expressly set out in this policy. You consent to our use of your information to issue product and professional mail outs by email, fax, social media or letters and undertaking other marketing or service based activities. You may opt out of any direct marketing service at any time.*

## **Cross Border**

We may share your personal information with the Sun Island Tours group of companies around the world.

We may also use Saas, Cloud computing or other technologies from time to time and your information may be stored outside Australia. We will not transfer personal information to a recipient in a foreign country unless we have appropriate protections in place as required by the relevant privacy laws.

## **Help us to ensure we hold accurate information**

Sun Island Tours takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of the information we hold depends to a large extent on the information you provide. That's why we recommend you:

- let us know if there are any errors in your personal information; and
- keep us up to date with changes to your personal information such as your name or address.

You can easily edit or delete the personal information you provide to us on our websites (unless it is mandatory information required for your membership application), but to do so, you will need to log in as a registered user, using your username and password.

If you wish to access or modify personal information which you have provided via our websites, but cannot access that information at our websites, please send an email using the Contact Us page.

## **You can access your personal information**

You have a right to access your personal information, subject to some exceptions allowed by law. We will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information that we hold about you. If you would like to do so, please let us know by sending an email. You may be required to put your request in writing as well as provide proof of your identity for security reasons. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

Sun Island Tours reserves the right to charge a fee to reimburse the costs incurred for searching for and providing access to your information. However, no fees or charges apply to any request to add, change or delete your personal information, nor for correcting the information.

## **Timing**

We will take all reasonable steps to provide you with access to the information requested within 14 days of your request. In situations where the request is complicated or requires access to a large volume of information, we will provide access to the information requested within 30 days.

## **Security of your information**

We take reasonable steps to ensure that your personal information is stored securely. Transmissions sent to or from our websites are routinely monitored for quality control and systems administration. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. While we strive to protect your personal information from misuse, loss and unauthorised access, we cannot guarantee the security of any information you transmit to us or receive from our online products or services. These activities are conducted at your own risk. Once we receive your transmission, we make our best effort to ensure its security.

Credit card information is among the most important data we collect. Sun Island Tours operates secure servers to minimise the risk of unauthorised use of such information. Credit card information that is transmitted via our secure servers is encrypted in accordance with the highest standards over the EFTPOS network. For obvious reasons, please do not send credit card information through unsecured email.

## **Prohibited Uses**

It is prohibited to use any device, software or routine, directly or indirectly, to interfere or attempt to interfere with the proper working of the Website, any activity being conducted on this site or to place any undue load or stress upon our systems. We monitor access to the site for data scrapers and automated access of information and we will block processes engaging in these activities.

## **What else you should know about privacy**

Remember to close your browser when you have finished your user session. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe. You as an individual are responsible for the security of and access to your own computer.

Please be aware that whenever you voluntarily disclose personal information over the Internet (for example: in discussion forums, via email, or in chat sites) that this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return.

Ultimately, you are solely responsible for maintaining the secrecy of your username and passwords and any account information. Please be careful and responsible whenever you are using the Internet and our Websites.

### **Complaints**

Where there is a dispute about your right of access to information, or about any aspect of this Privacy Policy, please contact us.

### **How to contact us**

If you have any questions in relation to privacy, please contact us on 1300 665 673 between 9.00 am and 5.00 pm , Monday to Friday. Alternatively, you can:

- contact us via email; or
- Write to our CEO, at Suite 330, 410 Elizabeth St, Surry Hills NSW AUSTRALIA 2010.

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