

# Privacy Policy

## // About this document

### **Policy purpose:**

Plan2go is committed to safeguarding the privacy of its customers, employees and stakeholders. The Company's Privacy policy regulates the handling of any personal information that Plan2go collects.

### **Policy authority:**

This policy reflects the rights, responsibilities and entitlements outlined in the following legislation:

- *The Privacy Act 1988 (Cth)* and 13 Australian Privacy Principles (APPs)

This policy has been authorised by the Captain in Charge.

### **Policy application:**

This policy applies to all employees and customers of Plan2go.

### **Expected update frequency:**

Every two years.

### **Policy location:**

<http://plan2go.nctafe.edu.au/assets/intranet/Crew-Folders/Cabin-Crew/Communication/Privacy-Policy.pdf>

## // Document control

Version	Description	Date modified	Author
1	Initial policy	3/04/2009	Tobias Ukestock
2	Review of policy	13/06/2011	Julia Stickler
3	Template and branding update	26/11/2012	Justin Hart
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# 1. Definitions

Privacy in Australia is governed by the *Privacy Act 1988 (Cth)* which also includes thirteen Australian Privacy Principles (APPs). This legislation relates to the protection of an individual's personal information.

## 1.1 Personal information

**Personal information** is defined in the Privacy Act as “information or an opinion about an identified individual, or an individual who is reasonably identifiable”.

## 1.2 Identification information

The *Privacy Act 1988* defines **identification information** about an individual as information including their:

- Full name
- Alias or previous name/s
- Date of birth
- Gender
- Current or last known address and previous two (2) addresses
- Current or last known employer
- Driver's licence number (if one held).

## 1.3 Sensitive information

The *Privacy Act 1988* defines **sensitive information** about an individual as:

- Information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political associations, religious beliefs, philosophical beliefs, memberships, sexual orientation or practices, criminal record
- Health information
- Genetic information
- Biometric information.

## 1.4 Employee record

The *Privacy Act 1988* defines an **employee record** as a “record of personal information relating to the employment of the employee”. This can include, but is not limited to the employee's:



- Engagement, training, disciplining or resignation
- Termination information
- Terms and condition of employment
- Personal and emergency contact details
- Performance or conduct
- Hours of employment
- Salary or wages
- Membership of a professional or trade association
- Trade union membership
- Recreation, long service, sick, personal, maternity, paternity or other leave
- Taxation, banking or superannuation affairs.

## 2. How personal information is collected

Plan2go will where practical, collect personal information directly from you. Collection of information will occur when you deal with Plan2go either in person, by telephone, letter, facsimile, email, social media or when you visit our website.

Plan2go may collect personal information about you when you purchase or make enquires about travel arrangements or other products and services, when you subscribe to receive marketing from us (e.g. e-newsletters) or when you request brochures or other information from us. We may also collect your personal information when you complete surveys or provide us with feedback.

In some circumstances, it may be necessary to collect personal information about you from a third party; for example 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). Where this occurs, we will assume you have consented to your personal information being collected by us and to us handling it in accordance with 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.

## 3. What information is collected?

Generally, the type of personal information Plan2go needs to collect about you is that information needed to facilitate your travel arrangements and bookings and to arrange travel-related services and products on your behalf. Plan2go may collect details such as your:



- Name
- Residential address
- Mailing address
- Telephone number
- Email address
- Credit/debit card details (including card type, card number, security number and expiry date)
- Passport details
- Frequent flyer details
- Information about your dietary requirements and health issues (if any)
- Other details relevant to your travel arrangements or required by the relevant travel service providers (e.g. airlines, accommodation or tour providers).

## 4. Acting as an agent

When we book products and services for you, we usually do so as an agent for or on behalf of travel service providers. This means we usually collect personal information about you both for our internal purposes (e.g. to process your booking), and on behalf of the parties for whom we act as agent, for their internal purposes (e.g. to provide the booked services).

Accordingly, the consent you provide under this policy to the collection and use of personal information by us, applies equally to the parties whose products and services we sell. For example, if you purchase a flight from us, then under this policy you will have consented to your personal information being provided to the airline to enable your flight to be booked.

We act as agent for or on behalf of many thousands of travel service providers, so it is not possible for us to set out in this policy all of the travel service providers for whom we act nor exactly how each of these travel service providers will use your personal information.

If you wish to contact us for further information, please refer to Section 13 – Feedback and complaints below.

## 5. How personal information is used

The main 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 providing us, or otherwise allowing us to collect, your personal information, you consent to



us using and disclosing your personal information for the purposes for which it was collected, and for related or ancillary purposes, such as any one or more of the following purposes:

- Identification of fraud or error
- Regulatory reporting and compliance
- Providing updates on promotions and services we think may interest you
- Gauging your satisfaction and seeking feedback regarding our relationship with you
- To analyse trends in sales and travel destinations
- Internal accounting and administration
- Other purposes as permitted or required by law (e.g. to prevent a threat to life, health or safety).

Plan2go are only allowed to store your personal information for as long as necessary having regard to the purpose for which it was collected or a related or ancillary purpose. We may therefore delete your personal information after a reasonable period of time and, if you have not used our services for some time, you may have to re-enter or re-supply your personal information to us.

## 6. Third party disclosure

Consent to third party disclosure is given when you consent to the personal information about you which we collect or receive being processed, transferred and/or disclosed by us in the following circumstances:

- in each of the circumstances set out in the previous Section 5 – How personal information is used
- as permitted or required by law
- to various regulatory bodies and law enforcement officials and agencies
- to travel service providers such as travel wholesalers, tour operators, airlines, hotels, car rental companies and other service providers for the purpose for which the information was collected
- to comply with our legal obligations and any applicable customs/immigration requirements relating to your travel.

Where we engage travel service providers to perform services for us, those travel service providers may be required to handle your personal information. Where we disclose your personal information to such travel service providers, you agree that we will not be required to ensure their compliance with applicable privacy laws or otherwise be liable or accountable for how they handle your personal information.



Other than for the above reasons, Plan2go 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.

## 7. Trans-Border data flows

When you provide, or allow us to collect, your personal information, you consent to your personal information being disclosed to certain overseas recipients.

Where we disclose your personal information to an overseas recipient, you agree that we will not be required to ensure the recipient's compliance with Australian privacy laws or otherwise be liable or accountable for how the recipient handles your personal information. Please advise us if you have any objections to your personal information being disclosed to an overseas recipient.

In providing our services to you, it may be necessary for us to disclose personal information to relevant overseas travel service providers. For instance, where you request travel to be booked with an overseas travel service provider, we will usually need to disclose your personal information to that provider for the purposes of arranging your booking with them. These 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 is based.

We deal with many different service providers all over the world, so it is not possible for us to set out in this policy all of the different countries to which we may send your personal information. However, if you have any specific questions about where or to whom your personal information will be sent, please do not hesitate to contact us.

## 8. Security

Plan2go has implemented various physical, electronic and managerial security procedures in order to protect personal information from loss and misuse, and from unauthorised access, modification, disclosure and interference. The steps we take to secure personal information include:

- Website protection measures
- Security restrictions on access to Plan2go's computer systems
- Controlled access to Plan2go's corporate premises
- Policies on document storage and security, personnel security and training.

While we endeavor to protect the personal information of users of our website, we cannot guarantee the security of information you disclose online. You disclose that information at your



own risk. You can also help protect your personal information by keeping your account details confidential. If you become aware of any security breach, please let us know as soon as possible.

Plan2go regularly reviews security and encryption technologies and will strive to protect your personal information as fully as we protect our own confidential information.

## 9. Access to personal information

Please contact us if you would like to access or correct the personal information that we hold about you. We may ask you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

We will generally provide you with access to your personal information within 30 days, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (e.g. by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.

## 10. Unsubscribe from e-marketing

Should you no longer wish to receive e-newsletters or other promotional material, participate in market research or receive other types of communication from us, please refer to Section 13 – Feedback and complaints below.

## 11. Tracking technologies

Plan2go uses a number of common tracking technologies to enhance your experience upon your return visits to our site.



### 11.1.1 COOKIES

A cookie is a small text file that is stored on a user's computer for record-keeping purposes.

We may use temporary (session) cookies or permanent cookies when you access our web site. This allows us to 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 your name, password, username, screen preferences, the pages of a site viewed, and the advertisements viewed or clicked. At Plan2go we use cookies to identify a visitor's browser, to anonymously track visits or to enhance the experience of the website. You can switch off cookies by adjusting the settings on your web browser.

### 11.1.2 GOOGLE ANALYTICS

When you visit certain sections of the website, Google Analytics, a website analytics service provided by Google, Inc ("Google"), will place 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 to enable us to measure and analyse the number of visits to the site and its pages, the average time spent on the site and the pages viewed. We will not (and will not allow any third party to) 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.

You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on which you may access at <https://tools.google.com/dlpage/gaoptout/>.

## 12. Third party tracking

Links to third party sites that are not operated or controlled by Plan2go are provided for your convenience.

Plan2go is not responsible for the privacy or security practices of those sites, which are not covered by this Privacy policy.

Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.



## 13. Feedback and complaints

If you would like further information about how we manage your personal information, or if you have any enquiries, comments or complaints about this Privacy policy or our handling of your personal information, please contact our Customer Service Hotline on 1800 975 710 or email us at [info@plan2go.com](mailto:info@plan2go.com). We will respond as soon as practicable.

## 14. Changes to our policy

Plan2go may amend this Privacy policy from time to time.

We reserve the right to change our policy at any time and for any reason. If we make a change to the policy, the revised version will be posted on our website and a copy may be obtained by contacting Customer Service Hotline on 1800 975 710.

Last updated 7 November, 2014.

## 15. Employee records policy

Plan2go's employee records and the handling of the information listed in Section 1.4 is discussed in Plan2go's Confidentiality policy.

