



# Privacy Policy

## Bookeasy Privacy Policy

This Privacy Policy (“Policy”) explains in general terms how Bookeasy and controlled entities (Bookeasy Pty Ltd ABN 68 122 744 209) (“we” “our” or “us”) protects the privacy of your personal information. This Policy sets out how Bookeasy aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Bookeasy and the way Bookeasy collects, holds, uses and discloses your personal information.

We are firmly committed to protecting the privacy and confidentiality of personal information and maintain robust physical, electronic and procedural safeguards to protect personal information in our care. In handling your personal information, Bookeasy’s Policy endeavours to comply with the

Privacy Act 1998 (Cth) (“the Privacy Act”) and the 13 Australian Privacy Principles.

### 1. What is personal information?

Personal information is information or an opinion, in any form (whether true or not) about a natural person whose identity is apparent or can reasonably be ascertained from the information or opinion.

### 2. How do we collect personal information?

We provide software solutions for booking centres that facilitate accommodation providers to both be able to provide booking services online, as well as through third party distribution channels, to reach their maximum potential clientele. As such we provide a means by which potential customer can be exposed to greater availability, options and pricing when it comes to accommodation choice.

To provide such an intermediary service we may be required to transfer and/or hold your personal information. This information would be provided by you when you enter your details to make a booking through one of the many third party distribution channels, accommodation providers’ or booking centre’s websites we are affiliated with and whom we provide a service.

### 3. Why do we collect personal information?

Bookeasy collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of providing the booking centre or an entity with which you are affiliated with an accommodation booking that we help facilitate.

We provide an essential technological solution between parties to facilitate the process of you being able to make an accommodation booking online.

### 4. What personal information do we collect?

Generally, the type of personal information we collect about you is the information that is required to facilitate your accommodation arrangements and bookings. For example, we may collect details such as your name, country of origin, residential address, mailing address, telephone number, email address, and credit card number and expiry date. We also collect information that is required for use in the transaction, including for example, financial details necessary in order to process various transactions and any other information you may elect to provide to us. In some circumstances Bookeasy may also hold other personal information that has been provided by you.

By providing these details to a third party you consent to the collection of all information which is provided to us for use in accordance with this Policy, unless you tell us otherwise.



## 5. When we act as agent

When we facilitate an accommodation booking, we do so as a facilitator between a third party distribution channel and the accommodation provider or booking centre. This means that we usually collect personal information about you both for our internal purposes, and on behalf of the parties for whom we act as agent for their internal purposes. Accordingly, the consent you provide under this statement to the collection of personal information by us, applies equally to the accommodation providers and third party distribution channel operators. For example, if you purchase a hotel booking that is facilitated by us, then under this Policy you will have consented to your personal information being collected by a third party, which is used by us to provide these details to the hotel to enable your accommodation to be booked.

We act as agent for many hundreds of companies, so it is not possible for us to set out in this statement exactly how each of these companies will use your personal information, but we are happy to provide more specific information to you if you contact us via the details provided in section 10 of this Policy.

Where personal information is used or disclosed, Bookeasy takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Bookeasy. However, without certain information from you, Bookeasy may not be able to facilitate your booking.

## 6. How do we use personal information?

We will use your personal information to facilitate your accommodation needs. We may use and disclose your personal information for the purposes for which it was collected, or for a related or ancillary purpose such as any one or more of the following purposes:

- identification of fraud or error;
- regulatory reporting and compliance; and internal accounting and administration.

## 7. Is the information disclosed to third parties?

We may disclose your personal information: as permitted or required by law; to various regulatory bodies and law enforcement officials and agencies to protect against fraud and for related security purposes; to related entities as well as to our third party service providers; to third parties such as hotels, booking centres and other accommodation providers for the purpose for which the information was collected or for a related purpose, for example to facilitate and process your accommodation extras and inclusions.

The third parties to whom we disclose your personal information may also be taken to have collected your personal information in their own right, for their internal use. For more information, see the heading above, titled "When we act as agent".

Where we engage third party contractors to perform services for us those third party contractors may be required to handle your personal information. Under these circumstances these third party contractors must safeguard this information and must only use it for the purposes for which it was supplied.

Other than the above, we will not disclose your personal information without your consent, unless disclosure is either necessary to prevent a threat to life or health; authorised or required by law; reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.

## 8. Security of information

Bookeasy has implemented stringent physical, electronic and managerial security procedures in order to protect personal information from loss, misuse, alteration or destruction. Bookeasy regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.



### 9. Access and correction of personal information

Bookeasy takes steps reasonable in the circumstances to ensure the personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by Bookeasy. If at any time you would like to access or correct the personal information that Bookeasy holds about you, or you would like more information on Bookeasy's approach to privacy, please contact Bookeasy via the contact details set out in Section 10 of this Policy. Bookeasy will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;

Bookeasy requests that you be reasonably specific about the information you require; and Bookeasy may charge you a reasonable administration fee, which reflects the cost to Bookeasy for providing access in accordance with your request.

Bookeasy will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of Bookeasy. If Bookeasy refuses your request to access or correct your personal information, Bookeasy will provide you with written reasons for the refusal and details of complaint mechanisms.

Bookeasy will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

### 10. How to contact us

For further information, feedback or enquiries regarding this Policy, or to access your personal information, please contact Bookeasy's Chief Information Officer by:

#### Post

Bookeasy  
Chief Information Officer  
PO Box 3727 AUSTRALIA FAIR QLD 4215

#### Phone

(During office hours 8.30am – 5pm AEST Monday-Friday)  
(07) 5668 2540

#### Fax

(07) 3036 6921

#### Email

bryan@tourismholdings.com

### 11. Complaints

If you have any complaints about our privacy practices, please contact us via the details provided for in section 10 of this Policy.

We take complaints very seriously and will respond to acknowledge your complaint within 7 days of receipt. We aim to provide you with a response to your complaint within 14 days of receipt.



### **11.1. Office of the Australian Information Commissioner**

If you are unsatisfied with the response we provide to your complaint relating to your privacy or if you feel the issue remains unresolved, you may wish for the Privacy Commissioner to further investigate your complaint. You can contact the Office of the Australian Information

Commissioner as detailed below:

Post

Office of the Australian Information Commissioner

GPO Box 5218  
SYDNEY NSW 2001

Phone

From within Australia phone 1300 363 992

Email

enquires@oaic.gov.au

### **12. Changes to our Policy**

From time to time it may be necessary for us to review and revise this Policy. We reserve the right to change our Policy at any time. Should this occur the amendment will be posted on our website.

### **13. About Our Website**

#### **13.1. When You Visit Our Website**

If you visit Bookeasy's website to browse, read or download information, our system will log these movements. These web site logs are not personally identifiable and Bookeasy makes no attempt to link them with the individuals who browse the site.

When you come on to our website we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc.

This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

#### **13.2. Use of Cookies**

A cookie is a small piece of text that is placed within the memory of a computer and can be later retrieved by web page servers. We use cookies to enhance your interaction and convenience with our website and do not use cookies to record any personal information.

#### **13.3. Linked Sites**

Our website may contain links to other sites. We are not responsible for the privacy practices or the content of such web sites that you directly interact with. We encourage you to read the privacy statements of any linked sites as their privacy policy may differ from ours.