

MULGA BICYCLE TOURS

PRIVACY POLICY



Our commitment to protecting your privacy: This privacy policy applies to the collection, storage, use and disclosure of personal information by or on behalf of Multilocus Interactive Pty Limited (ACN 085 586 661) trading as Mulga Bicycle Tours (referred to in this policy as “Mulga Bicycle Tours”, “our”, “we” or “us”). Please read it carefully.

We are committed to protecting your personal information, and ensuring its privacy, accuracy and security. We handle your personal information in a responsible manner in accordance with the Privacy Act 1988 (**Act**) and the Australian Privacy Principles (**APPs**).

By using any of our products or services, visiting our website www.mulgabicycletours.com.au or giving us your personal information, you agree to your information being collected, stored, used and disclosed as set out in this Privacy Policy.

Personal information: ‘Personal information’ means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether or not recorded in a material form.

‘Sensitive information’ (a type of personal information) includes health information.

Whose personal information do we collect? We may collect your personal information from a range of sources, including from you, recruitment agencies, contractors, business partners and government agencies. For example, we may collect your personal information when you book a tour with us, provide a service or product to us, apply for employment with us or communicate with us via our website, by e-mail, telephone or in writing.

Wherever reasonable and practicable, we collect personal information from the individual to whom the information relates. If you provide personal information about someone other than yourself, you agree that you have that person’s consent to provide the information for the purpose for which you provide it to us. You also agree that you have told the person about this Privacy Policy and where to find it.

What types of personal information do we collect and hold? The personal information we collect includes:

- names, addresses, proof of identity information, taking photographic and video footage of participants on our tours, e-mail addresses, phone numbers, payment details, occupation and other information to assist us in conducting our business, providing and marketing our products and services;
- information about staff and directors, as required in the normal course of human resource management and the operation of a business; and
- information about current and previous Mulga Bicycle Tours suppliers and clients with whom Mulga Bicycle Tours has dealings.

We will only collect your sensitive information: if you have consented to us doing so – for example, as part of information collected about directors and employees for company and human resource management purposes; as part of health information collected about individuals to determine whether they are suitable to participate in our tours; or where required or permitted by law.

How do we collect personal information? We only collect personal information by lawful and fair means.

We usually collect personal information from:

- our website, including if you use it to contact us or make a tour booking with us;
- electronic communications – for example, e-mails and attachments; forms filled out by people, including as part of booking a tour with us;
- face-to-face meetings, interviews and telephone calls;
- business cards; and
- third parties – for example, from recruitment agencies and your representatives or agents.

Why do we collect personal information? We collect the personal information: necessary for us to provide you with the products and services you have requested from us, including to provide bicycle tours; for marketing purposes and to provide you with information about products and services that may be of interest to you; to improve the products and services we provide; and to enable us to conduct our business, including meeting our legal and regulatory obligations. If you do not provide your personal information, we may not be able to supply the requested product or service, employ you or otherwise deal with you.

How do we deal with unsolicited personal information? If we receive personal information about you that we have not requested, and we determine that we could not have lawfully collected that information under the APPs had we asked for it, we will destroy or de-identify the information if it is lawful and reasonable to do so.

Use of personal information: We only use your personal information for the purpose for which it was provided to us, for related purposes or as required or permitted by law. Such purposes include:

- in the ordinary course of conducting our business. For example, supplying our services such as conducting our bicycle tours, acquiring products and services, such as booking tour accommodation or providing you with medical services in the event of an accident, responding to your enquiries and feedback, and providing information about our events, news, publications and products and services that may be of interest to you;
- market research and product and service development, so that we are able to better understand our customers' needs and tailor our future products and services accordingly;
- performing general administration, reporting and management functions. For example, invoicing and account management, payment processing, risk management, training, quality assurance and managing suppliers;
- employment-related purposes, such as recruiting and providing services to staff;
- as part of a sale (or proposed sale) of all or part of our business; and
- other purposes related to or in connection with our business, including meeting our legal and contractual obligations to third parties and for internal corporate governance purposes.

Disclosure of personal information: We may disclose, and you consent to us disclosing, your personal information to third parties:

- engaged by us to provide products or services, or to undertake functions or activities, on our behalf. For example, providing accommodation services to our tour participants, processing payment information, managing databases, marketing, research and advertising;
- that are authorised by you to receive information we hold;
- that are our business partners, joint venturers, partners or agents;
- as part of a sale (or proposed sale) of all or part of our business. For example, we may disclose information to our external advisers, to potential and actual bidders and to their external advisors;
- such as our external advisers, and government agencies. For example, where disclosure is reasonably required to obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct; or
- as required or permitted by law.

We may disclose, and you consent to us disclosing, your personal information to any of our related bodies corporate whether located in Australia or overseas. If we disclose your personal information to a related body corporate, your information will be collected, stored, used and disclosed in accordance with this Privacy Policy and the APPs.

Marketing use and disclosure: We may use and disclose your personal information (other than sensitive information) to provide you with information about our products and services that we consider may be of interest to you. You may opt out at any time if you do not, or no longer, wish to receive marketing and promotional material. You may do this by: contacting us via e-mail or in writing at the address below and requesting that we no longer send you marketing or promotional material; or where applicable, clicking the "Unsubscribe" button.

Use or disclosure of sensitive information: We will only use or disclose your sensitive information for the purpose for which it was initially collected or for a directly related purpose, as required or permitted by law, or where you consent to the use or disclosure.

Disclosure of personal information overseas: We do not disclose personal information to third parties outside Australia, unless required or permitted by law.

How is my personal information kept secure? We take reasonable steps to protect your personal information from misuse, interference, loss and unauthorised access, modification and disclosure. Such steps include: physical security over paper-based and electronic data storage and premises; computer and network security measures, including use of firewalls, password access and secure servers; restricting access to your personal information to employees and those acting on our behalf who are authorised and on a 'need to know' basis; retaining your personal information for no longer than it is reasonably required, unless we are required by law to retain it for longer; and entering into confidentiality agreements with staff and third parties.

Where we no longer require your personal information, including where we are no longer required by law to keep records relating to you, we will ensure that it is de-identified or destroyed.

Data quality: We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date. However, we rely on you to advise us of any changes or corrections to the information we hold about you. If you consider that the information we hold about you is not accurate, complete or up-to-date, or if your information has changed, please let us know as soon as possible.

Access: You may request access to the personal information we hold about you by contacting us. We will respond to your request within a reasonable time. We will provide you with access to the information we hold about you unless otherwise permitted or required by law. If we deny you access to the information, we will notify you of the basis for the denial unless an exception applies. Where reasonable and practicable, we will provide access to the information we hold about you in the manner you request. No fee applies for requesting access to information we hold about you. However, we reserve the right to charge a reasonable fee where we do provide access.

Correction: If you believe that personal information we hold about you is incorrect, incomplete or not current, you may request that we update or correct your information by contacting us. We will deal with your request within a reasonable time. If we do not agree with the corrections you have requested (for example, because we consider that the information is already accurate, up-to-date, complete, relevant and not misleading), we are not required to make the corrections. However, where we refuse to do so, we will give you a written notice setting out the reasons.

Changes to this Privacy Policy: We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Policy periodically for changes. Any revised policy will be placed on our website at www.mulgabicycletours.com.au. Your continued use of our website, products or services, requesting our assistance, or the provision of further personal information to us after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

Complaints: If you have a complaint in relation to the collection, storage, use or disclosure of your personal information, please contact our Privacy Officer using the details below. You will need to provide us with details of your complaint, as well as any supporting evidence and information. We will review all complaints received and our Privacy Officer will respond to you.

— HOW TO CONTACT US —

If you have any questions about this Privacy Policy, please contact
Mulga Bicycle Tours' Privacy Officer:

(a) by email to: hello@mulgabicycletours.com.au

(b) by telephone: **02 6262 3957**

EFFECTIVE DATE: 1 FEBRUARY, 2016

Version 1.0 - 1 February, 2016

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Mulga Bicycle Tours is a Division of Multilocus Interactive Pty Ltd / ACN 085 586 661 / ABN 47 085 586 661