



**THE TAILOR PTY LTD ACN 068 690 700  
PRIVACY POLICY**

## **Your Privacy is Important to Us**

The Tailor Pty Ltd ('**TT**') and any related entities (as that term is referred to in the *Corporations Act 2001* (Cth)), collectively referred to as '**we**', '**us**' and '**our**', are bound by the National Privacy Principles ('**NPPs**') contained within the *Privacy Act 1988* (Cth) ('**Act**'), and the General Data Protection Regulation (EU 2016/679) ('**GDPR**'). TT is committed to the protection of your Personal Information in accordance with the NPPs and the GDPR. This Privacy Policy describes TT's personal information handling practices and applies to each and every individual who uses TT website(s) and or our Services. It explains in general terms how we collect, store, use and disclose your personal information, and sets out your right to request access to information that we hold about you.

## **Scope and Your Consent**

This Privacy Policy will apply to any Personal Information you provide to us when making an enquiry, making a travel, accommodation or activity booking, using our Website(s) (ie [www.thetailor.com](http://www.thetailor.com) or any other websites operated by us), under any agreement or arrangement that we enter into with you, or otherwise in the course of our dealings with you ('**Services**')

When making enquiries and by accepting the terms and conditions when making any booking through our Website(s) or otherwise or providing us with Personal Information or Sensitive Information, you will be deemed to have consented to us collecting, using and disclosing your Information (within and outside Australia) in accordance with this Privacy Policy.

If this Privacy Policy is not acceptable to you, please do not use our Website(s) or use our Services.

This Privacy Policy will also apply to any information that is provided to us by a travel agent or other third party in relation to your travel plans.

Personal Information has the meaning given under the Act but generally includes information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Sensitive Information is the information that we collect about you may include some Sensitive Information (e.g. health information), which is relevant to your travel, and activity plans. Under the Act, we are required to obtain your consent to the collection and use of any Sensitive Information. We will assume that you have consented to the collection, use and disclosure by us of any Sensitive Information, which you provide to us for the purposes set out in this Privacy Policy, unless you tell us otherwise.

## **Collection of Personal Information**

We only collect Personal Information, which is necessary in connection with our business purposes and to provide you with the Services you require.

### **For travellers, the purposes for which we collect Personal Information include:**

1. To contact you, answer your queries and provide you with information in relation to travel options, accommodation and adventure activities; and
2. When requested to do so, arrange and book travel, accommodation and adventure activities on your behalf, invoice you for confirmed travel arrangements, and to complete related transactions.

### **For homestead owners and activity providers, the purposes for which we collect Personal Information include:**

1. To market and promote your homestead and/or the activities and services you provide to travellers; and
2. To make bookings for travellers at your facilities and to provide travellers with your contact details.

The specific type of Personal Information collected and used by us varies according to the purpose for collection. However, in general this information includes:

- a) in relation to travellers: your name, addresses, contact details (eg telephone numbers, facsimile number, home and business address and email address), flight and other travel details, credit card details (ie card type, security number, card holder name, expiry date and issuing bank and country to pay for products and services offered), billing address, dietary requirements (if any), any health issues that may be relevant to your proposed travel or adventure activity arrangements, and information regarding past transactions or dealings that we have had with you, including information about any special requirements that you may have; and
- b) In relation to homestead owners and activity providers: your name, address, contact details (eg. telephone numbers, facsimile number, home and business address and email address), and details about your property and/or the activities and services you provide to travellers, including cost and availability.

### **How do we collect the Personal Information**

We collect most of the Personal Information we require directly from you by way of written forms, by telephone, in person, by our representatives, via our websites, or by written correspondence from time to time. We may also collect Personal Information about you from third parties, such as from people making travel bookings on your behalf, or from travel agents, booking agents, travel representatives, or homestead owners whom you have contacted regarding travel or accommodation arrangements.

Before providing us with any details about a guest / accompanying traveller you must ensure that the individual is aware of the disclosure of their information to us and the purposes for which the information is

collected and used by us and the individual's ability to request access to the information that we hold about them. Our Privacy Policy applies equally to any guest or accompanying traveller.

It is important that we collect the information we require about you. Without this information, we may not be able to provide you with our travel and accommodation information and booking services.

Before providing us with personal information about another individual, you must first ensure that the other individual is aware of:

- a) The disclosure of their information to us and the purposes for which the information is collected and used by us; and
- b) The individual's ability to request access to the personal information that we hold about them, and to advise us if they think the information is inaccurate, incomplete or out of date.

If at any time you supply Personal Information to us about yourself or any other person (eg another person travelling with you or a photo you post, you represent (and we accept that information on the basis) that:

- Without us taking any further steps as required by the Act or the GDPR, we may collect, use and disclose such Personal Information for the purposes set out in this Privacy Policy, and
- You are authorized to provide us with that Personal Information and that relevant person has consent to the disclosure to us.

### **For Site visitors**

From time to time we may post surveys on our Website(s).

Site visitors may wish to participate in a survey, promotion or competition.

The personally identifiable information (PII) we collect when you participate in a survey, promotion or competition may include your full name, email address, telephone number and street address.

When you submit a review we collect your name or other identifier nominated by you, other personal details as may be provided by you and your comments when you submit a review to us. We may publish these details.

If a card payment occurring on our Site is disputed, we may request from the Supplier of the booked service a copy of the photo ID and other check-in details provided to them. This information may be used by us in connection with the dispute.

When you visit our Site, we record general information about your visit for statistical purposes. These statistics do not contain any PII.

We retain contact and booking details in the My Account section. This provides you with the ability to check on previous purchases, allows your information to be prepopulated ensuring a faster and easier booking process.

When you contact us for any queries, requests or for any other reason, we will collect contact information from you to suitably handle your request.

We may also use your information to provide you with updates and other information from time to time about travel, accommodation or adventure activities that can be booked through our Site and any other information about the goods, services and activities offered by us or third parties. You may notify us at any time if you do not wish to receive this information by clicking on the unsubscribe link within the email.

When you visit the Site, we record general information about your visit for statistical purposes. These do not contain personal information.

### **Use and Disclosure of Personal Information**

We will not disclose your Personal Information for a purpose other than those connected with the primary purpose of collection, as set out in this Privacy Policy. Such purposes may include disclosing your Personal Information to third parties in certain circumstances as follows:

- a) If you agree to the disclosure
- b) For the purpose for which it was collected, eg to provide you with the Services;
- c) Where required or authorised by law;
- d) Where disclosure is necessary to prevent a threat to life or health, to enforce the law, or to investigate a suspected unlawful activity;
- e) To provide information to agents, contractors and service providers that we engage to provide us with goods and services or to act on our behalf (the identity of which may change from time to time);
- f) To provide you with updates and other information from time to time about travel options, homestead details and availability, adventure activities that can be booked through our offices, the packages that we offer, and other information about the goods, services and activities offered by us or third parties. You may notify us by written notice addressed to our Privacy Officer at any time if you do not wish to receive this information.
- g) In conjunction with the sale to a third party of TT or a related entity or a portion of our assets;
- h) Where it is required to be disclosed for audit purposes
- i) Where you would reasonably be expected to consent to information of that kind being passed to a third party

Subject to the preceding paragraph, we will only transfer personal information outside of Australia in accordance with the NPPs and GDPR including:

- a) With your consent;
- b) Where we are under a contractual obligation (with you or another party) to do so, or there is some other benefit to you; or

- c) Where we are satisfied that the recipient of the information will uphold principles for the fair handling of personal information, and will not deal with the personal information in a manner inconsistent with this Privacy Policy.

Your information may be disclosed between TT and any of its related companies, for the purposes set out in this Privacy Policy.

### **General Marketing**

Sensitive Information is not used for marketing purposes

TT may use and disclose Personal Information to provide you with information on offers, products and services offered by TT and you expressly consent to us doing so. We may also provide you with information on other product and services offered by TT, its partners or affiliates.

You may elect not to receive direct marketing communications from us by following opt out instructions below. Please note that even if you have requested not to receive further marketing communications we may still continue to provide you with information about changes to our terms and conditions for the supply of goods or services, questionnaires and other factual information, was permitted under the Act.

### **Tracking Tools / Cookies**

We may from time to time use 'cookies' to store your preferences, record session information and collect information on how you visit and access our Site. This information allows us to continually improve our services to provide you with a better overall experience.

Cookies are small files stored on your computer, tablet or other mobile device which allow us to recognise when you return to the Site. The use of cookies is an industry standard and are generally used to improve the user experience. Cookies in and of themselves do not personally identify you, only your computer.

You may from time to time have third party's advertisements and promotional content delivered to you to ensure that we are showcasing deals that are relevant to you.

a) **Necessary Cookies:**

These cookies are necessary for our website to function and as such are automatically installed. For example:

- Helping route the website to your browser efficiently using our IT infrastructure.
- Saving your data on multi-page forms/checkouts (of any).
- Letting you share or like our content on social networks like Facebook and Twitter if the relevant widgets are present on our pages. If you are logged into a social network, these widgets will automatically let you share content to your account if you choose.

b) **Preference Cookies:**

These cookies save your preferences for any customisation of the website and are installed if you make a customisation.

c) Statistical Cookies:

These cookies help us determine user behaviour on the website by reporting on your session. These technologies do not cross-reference your browsing with data from other websites. If you are located in the European Economic Area, we ask each tool to only use a session cookie (ie. one that instructs the browser to clear it once you've finished your session).

Technologies used:

- Google Analytics ([Privacy Policy](#) | [Opt Out](#)) for tracking general & custom behaviour on the website. We use all options that Google Analytics provides for maximising your privacy including instructing it to anonymise your IP address, transmitting data by an SSL connection only and manually stripping out any personally identifiable information before transmitting to Google Analytics.

d) Third Party Tracking/Marketing Cookies:

These cookies cross-reference your browsing with data from other websites to provide us with more accurate aggregated reports and to enable us to serve you personalised ads, including ads based on your browsing behaviour on this website. This functionality is aggregated: we do not use any provider that allows us to see your specific data or to create an ad specifically for you. If you are located in the European Economic Area, we do not use these cookies.

Technologies used:

- Google Analytics Doubleclick ([Privacy Policy](#) | [Opt Out](#)) for providing us aggregated reporting of your demographics & interests as determined by Google from any Google accounts you have, as well as allowing us to serve you ads on third party websites based on your browsing behaviour.
- Google AdWords ([Privacy Policy](#) | [Opt Out](#)) as above but this also allows Google to deduplicate your browsing sessions to this website across multiple browsers/devices for the purposes of tracking conversions.
- Facebook Ads ([Privacy Policy](#) | [Opt Out](#)) allows us to serve you ads based on your browsing behaviour on our website as well as see aggregate reports that deduplicate your browsing sessions to this website across multiple browsers/devices.

e) A/B Testing and Personalisation Cookies:

These cookies allow us to improve our website by consistently showing you the same variation of a website and seeing which variation engages users more. This functionality is aggregated: we do not use any provider that allows us to see your specific data or to create an ad specifically for you. If you are located in the European Economic Area, we do not use these cookies.

Technologies used:

- Optimizely ([Privacy Policy](#) | [Opt Out](#)) for serving different versions of one or more pages on our website based on a combination of chance and selected targeting criteria (eg. your location or referral source).
- Unbounce ([Privacy Policy](#) | [Opt Out](#)) for similar purposes.

f) CRM and CRM-Like Cookies/Tracking:

These cookies allow us to view some aspects of your website browsing behaviour on an individual basis. No providers we use store any personally identifiable data in the cookie, what's stored instead is a pseudonymous identifier (eg. your account ID) which is then tied to any additional data on the

provider's end (ie. not in your browser or on the website). If you are located in the European Economic Area, we do not use these cookies.

Technologies used:

- Hotjar ([Privacy Policy](#) | [Opt Out](#)) for generating usage heatmaps & browsing session recordings. Hotjar automatically removes any personally identifiable information from these reports.
- Google Analytics UserID ([Privacy Policy](#) | [Opt Out](#)) for combining the standard Google Analytics reports with a pseudonymous and/or encrypted identifier. This occurs only if you choose to personally identify yourself on this website (eg. by creating an account or adding your personal details to a form). Any browsing behaviour you perform while logged out will NOT be associated with this ID.
- Active Campaign ([Privacy Policy](#) | [Opt Out](#)) for combining your browsing behaviour with interactions we may have had with you outside of the website. This occurs only if you choose to personally identify yourself on this website (eg. by creating an account or filling out a form that requires your personal details).

Most internet browsers will be set to automatically accept cookies when installed. Cookies can be deleted at any time on your computer.

### **Linked Sites**

Our Site may contain links to other websites. We are not responsible for the privacy practices or the content of those other websites. We encourage that you read the privacy statements of any Linked Sites as their privacy policy may differ from ours

### **Opting out**

If at any time you no longer wish to receive any additional marketing or survey material from us or do not want your information disclosed for direct marketing or survey purposes, contact our Privacy Officer using the details below and we will remove your details from our marketing database.

### **Storage and Disclosure of Personal Information Off-Shore**

Personal Information you provide to us may be stored on TT's members' and/or its vendors' servers in countries other than the jurisdiction in which your Personal Information was collected.

If you access another TT website or a partner or service website (e.g. accommodation bookings, airline) from our Website(s), you may be transferring to another country and to a website over which we have no control and take no responsibility. If you provide Personal Information using another TT website or a service website, you do so subject to the privacy laws (if any) in that jurisdiction.

Similarly, if you request us to assist you with other goods or services, we may disclose your Personal Information to our agents, contractors, service providers and program partners who are located overseas when arranging or making inquiries in respect of those goods or services.

While TT has privacy rules in place to protect your Personal Information, the overseas recipient may not be subject to privacy obligations or to any principles similar to the Act or the NPP's. It is possible that

information will be transferred to a jurisdiction where you will not be able to seek redress under the Act and that does not have an equivalent level of data protection as Australia. The overseas recipient may also be subject to a foreign law which could compel disclosure of Personal Information to a third party, for example, an overseas authority.

We will not be accountable for how these overseas recipients handle your personal information. By providing your personal information to us, you consent to our disclosure of your Personal Information to these overseas recipients.

If you have any concerns regarding the transfer of your Personal Information overseas, or if at any time you wish to withdraw your consent, please contact our Privacy Officer.

Please note that if you withdraw your consent we may not be able to provide the Services you have requested in whole or in part or those Services may be compromised or otherwise not function properly.

### **Considerations when you send Information to us electronically**

While we take such steps as are reasonable in the circumstances to protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure, including investing in security software, no data transfer over the internet is 100% secure.

The open nature of the internet is such that information exchanged via the internet may be accessed and used by people other than those for whom the data is intended. If you send us any information, including (without limitation) Personal Information, it is sent at your own risk.

Please be aware that we provide links to third-party websites as a service to our users, and that we are not responsible for the content or information collection practices of those pages. Please note that these websites' privacy policies may differ from our Privacy Policy. We encourage you to review and understand their privacy practices before providing them with information.

Similarly, if you access a partner or service website (e.g. hotel, airline) from our Website, you do so and provide Personal Information in accordance with the terms and conditions, and the privacy policy, under which the provider of that website operates.

### **Security**

TT endeavors to keep our information systems and files secured from unauthorised access. Our procedures to securely store Personal Information include electronic and physical security measures, staff training and use of password protection software.

In the event of a security breach leading to accidental loss, disclosure or access to your Personal Information, we will comply with all our Act obligations including notifying you of such breach where required by law to do so.

When the Personal Information we collect is no longer required, we will remove or de-identify the Personal Information as soon as reasonably possible. TT may, however, retain Personal Information for as long as is necessary to comply with any applicable law, for the prevention of fraud, for insurance and governance purposes, in our IT back-up, for the collection of any monies owed and to resolve disputes.

## **Your rights regarding your Personal Information**

You may:

- Withdraw any consents given in relation to the handling by us of your Personal Information;
- Request access to your Personal Information;
- Request that we correct Personal Information that is inaccurate or out of date; or

Request that we delete certain Personal Information, by contacting our Privacy Officer using the details below. We will take reasonable steps, consistent with our obligations under the Act and, where relevant, the GDPR, to correct or delete that information if you so request. For security purposes, before we provide you with any Personal Information, we will ask you to provide evidence of your identity.

You may request the source of any Personal Information we collect from a third party. We will provide this unless under the Act or other law there is a reason for this information being withheld.

If you are located in a European Union Member State in which we offer goods or services, to the extent we are subject to the GDPR, you may request that we transfer your Personal Information to another organisation.

If there is a reason under the Act or other law for us not to provide you with any of your Personal Information, we will give you a written notice of refusal setting out the reasons for the refusal (except to the extent it would be unreasonable or unlawful to do so) and advise you of the mechanisms available to you to complain about the refusal.

## **Changes to Privacy Policy**

This Privacy Policy is current as at July 2018. We may review and update this Privacy Policy from time to time to reflect changes in the law, changes in our business practices, procedures and structure, and the community's changing privacy expectations. While it is not generally feasible to notify you of changes to this Privacy Policy, the latest version of the Privacy Policy will be available on our website at [www.thetailor.com](http://www.thetailor.com).

You can also contact our Privacy Officer to obtain the latest version of the Privacy Policy at any time.

## **Contact Information**

### **When to contact us**

You can contact us to:

- withdraw any consents given in relation to the handling by us of your Personal Information;
- request access to Your Personal Information;

- request that we correct Personal Information that is inaccurate or out of date; or
- request that we delete certain Personal Information

You should also contact us immediately if you believe:

- someone has gained unauthorised access to your Personal Information;
- you have a complaint in respect to the way we are dealing with your Personal Information; or
- you believe we have breached our privacy obligations or your privacy rights in any way.

### **Contact Details**

To request access to any Personal Information held about you in our records, to make a privacy related complaint, to obtain more information about this Privacy Policy or to enquire about privacy matters generally, please contact our Privacy Officer as follows:

The Privacy Officer  
The Tailor Pty Ltd  
33 Queen Street  
Thebarton, SA 5031  
Facsimile: (08) 8354 4406  
Email: [info@thetailor.com](mailto:info@thetailor.com)