

# COZITRIP PTY LIMITED

## PRIVACY POLICY

Effective 3 October 2016

**COZITRIP PTY LIMITED (Cozitrip, we, our and us)** (Level 2, 63 Dixon Street, Sydney 2000, NSW Australia) respects individual privacy and the rights of individuals to control their personal information. We are committed to protecting your personal information. This Privacy Policy sets out our policies and practices regarding the collection, use and disclosure of personal information that you provide to us and which we collect from you. By accessing or otherwise using our our mobile applications (the “**App**”), website at [www.cozitrrip.com](http://www.cozitrrip.com) (the “**Website**”), contacting us by email, telephone or through the Website, or using any of our other services or engaging with us in any other way, you agree to the terms and conditions set out in this Privacy Policy and consent to the processing of your information in accordance with this Privacy Policy and any other arrangements that apply between us.

### Types of personal information we collect and hold

“Personal information” is information or an opinion about you or which is reasonably identifiable as you, whether or not the information or opinion is true and whether or not the information is recorded in a material form.

The types of personal information that we collect includes:

- name, name of organisation, ACN, occupation / position title, address, profile picture, email address, telephone number, other contact details, group / booking numbers, age, gender;
- credit card information in writing; billing information;
- professional industries or organisations with whom you are affiliated;
- records of our interactions with you, including by telephone, email and online;
- details of services you have purchased through the Website or otherwise through our services or that you have enquired about;
- your computer and connection information, statistics on page views, traffic to and from the Website, advertising data and other standard web log information
- *location information*: we may collect precise location data from the App when you use certain of our services. If you enable the App to access location services through the permission system, we may collect precise location data even when the App is running in the foreground or background. We may use your internet IP and network information to estimate your location and/or city;
- *device information*: we may collect information about your mobile device, including, for example, the hardware model, operating system and version, software and file names and versions, preferred language, unique device identifier, advertising identifiers, serial number, device motion information, and mobile network information;
- any other personal information that may be required in order to facilitate your dealings with us.
- Any other personal information you may be volunteer.

We may also collect sensitive personal information including your racial or ethnic origin; religious beliefs or affiliations and membership of a professional or trade association. We will only collect your sensitive personal information with your express consent.

We may collect personal information about:

- individuals;
- contractors and suppliers;
- third parties seeking or using our services;
- other people who come into contact with us in the ordinary course of business; and
- applicants applying for a job or position with us: we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any

recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

## **How we collect and hold personal information**

In general, we do not collect your personal information, unless you provide it to us voluntarily and knowingly during your dealings with us, including by way of:

- when you consent to our App accessing certain types of data through mobile platforms;
- when you register to use and when you use our Website and/or App;
- personal contact with us at a face-to-face meeting or situation;
- correspondence, chats, social applications or services, mail, email or telephone;
- when you invest in our business or enquire about a potential acquisition of our business.

In some cases, we collect personal information from third parties including public sources, our related companies, travel agents, hotels and our service providers.

We may hold your personal information in hard copy files and/or electronic files.

## **Security**

Cozitrip takes reasonable steps to ensure that all personal information that we collect is kept secure in accordance with industry standard physical, electronic and managerial procedures. All of our staff are trained to comply with this Privacy Policy. In respect of personal information collected online or stored electronically (including in the cloud) in particular, you acknowledge that no security system is impenetrable and that the security of such networks and systems can never be guaranteed. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information which is transmitted to us is transmitted at your own risk.

## **Why we collect, hold, use and disclose your personal information**

Cozitrip will use and disclose your personal information only for the purpose (the “**primary purpose**”) for which you provide it to us, which may include:

- to provide you with any services that you may request including enabling you to access and use the Website, App and our services from time to time (including making your booking and passing it on to travel providers such as hotels);
- to respond to any query or complaint that you may make or otherwise provide customer support;
- for internal administration and operational purposes such as preventing fraud and abuse of our systems and to troubleshoot bugs;
- to operate, protect, improve and optimise our Website, App, services and our business such as to perform analytics, conduct research, evaluation and development and quality control purposes and for advertising and marketing;
- to send you marketing and promotional and other information that may be of interest to you. This may take the form of emails, SMS or other forms of communication;
- to administer promotions, rewards, surveys, contests or other events sponsored or managed by us or our partners;
- to consider your employment or contractual engagement application.

## **Who we disclose your personal information to**

We may disclose your personal information to:

- hotels and other travel providers with whom you have made a booking (through us);
- third party contractors engaged to perform functions or provide services relating to the purposes for which we collect personal information. If this is the case, we will take reasonable steps to ensure that they comply with this Privacy Policy;
- third party service providers or affiliates within or outside of Australia who work on behalf of or with us to provide some of our administrative and other services, such as processing payments (such as credit card payments). We require such service providers to agree not to use such information except as necessary to provide the services to us;
- third party audience measurement and analytics service providers that serve advertisements on our behalf across the Internet, and track and report on the performance of those advertisements;
- professional advisers, dealers and agents;
- any party to whom our assets or business may be transferred or with whom we are merged;
- enforcement or regulatory authorities, within and outside of Australia, if required by law.

## **Cookies**

While we do not use browsing information to identify you personally, we may use cookies, web beacons, and other tracking technologies to collect certain information about your use of the Website such as the pages you visit, the date and time of your visit, your IP address and your interaction with the Website. A cookie is a small file containing a string of characters that is sent to your computer or mobile device when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies.

## **Secondary purpose**

We will not use or disclose your personal information for any secondary purpose, unless you consent to that use or disclosure; or you would reasonably expect the use or disclosure in the circumstances, and that secondary purpose is related to the primary purpose for which we have collected that information. Except as set out in this Privacy Policy (or as required for any statutory or legal requirements), we do not share, sell, rent or otherwise disclose your personal information to third parties.

## **Links**

The Website may contain links to third party websites. Those links are provided for your convenience and may not be maintained or be current. We are not responsible for the privacy practices (or the content) of those third party websites. We have no control over nor do we have any rights in those websites. You should read the privacy policies of those third party websites before accessing and using them.

## **Access to and correction of your personal information**

Cozitrip will take reasonable steps to ensure that any personal information we collect is up-to-date, complete and accurate, and any personal information that we use or disclose is up-to-date, complete, accurate and relevant.

You may request access to your personal information and you may seek the correction of such information by contacting our us at [accounts@cozitrip.com](mailto:accounts@cozitrip.com) or at Cozitrip Privacy Officer Level 2, 63 Dixon Street, Sydney 2000, NSW Australia. Sometimes we may not be able to provide you with access to some or all of your personal information. If this is the case, we will tell you why. We may need to verify your identity when you request access to your personal information.

## **Complaints about a privacy breach**

If you believe that we have breached this Privacy Policy, you may direct your complaint to us at [accounts@cozitrip.com](mailto:accounts@cozitrip.com) or to Cozitrip Privacy Officer Level 2, 63 Dixon Street, Sydney 2000, NSW

Australia. Please include your name, email and/or telephone number. We will review your complaint and liaise with you directly to resolve your complaint within a reasonable time.

### **Overseas disclosures**

We may share your personal information with travel agents based in China, with hotels in New Zealand. These agents are contractually required to comply with by this Privacy Policy. Except as set out elsewhere in this Privacy Policy, we do not otherwise disclose your personal information overseas.

### **Changes to our Privacy Policy**

Any changes to this Privacy Policy will be posted on the Website. Unless stated otherwise, changes will be effective immediately upon being placed on the Website. Your continued use of the Website following such amendments being placed on the Website will represent an agreement by you to be bound by the Privacy Policy as amended.