Privacy Policy – [CLICK to Download](https://islandescapes.com.au/wp-content/uploads/2016/10/Final-Island-Escapes-Privacy-Policy.doc)

**1. Island Escapes Privacy Policy Commitment**
In this Privacy Policy a reference to ISLAND ESCAPES is a reference to Island Escapes Pty Ltd A.C.N. 106 125 142 their employees and agents together with, where the context admits, entities that are related or affiliated with Island Escapes Pty Ltd A.C.N. 106 125 142 in the provision of the Goods and/or services [“**Island Escapes**”]. This Privacy Policy details the type of personal information we collect when you use our websites, apps, software and services that link to this Privacy Policy [“**Services**”].

Island Escapes is committed to protecting your privacy and Personal Information when you deal with Island Escapes and ensuring that it collects, stores and deals with your Personal Information appropriately and lawfully, including in accordance with the relevant privacy legislation.

Any changes to this Privacy Policy will be updated on [www.islandescapes.com.au](http://www.islandescapes.com.au). Island Escapes may also issue specific privacy collection notices from time-to-time relating to particular promotions, destinations, products or services. The latest version of this policy will be the version posted to the Island Escapes website. Island Escapes reserves the right to amend this policy from time to time.

If you or your organization has an individual agreement with us, that agreement may have privacy terms that also apply to the information you provide to us under that agreement. Please review the terms in that agreement because they may be different or more restrictive than the terms in this Privacy Policy.

While our Services may contain links to websites owned by third parties, those websites are not subject to our privacy standards, policies and procedures. We recommend that you make your own enquires as to the privacy policies of these third parties and we are in no way responsible for the privacy practices of these parties.

By using our Services, you understand that we will collect and use your information as described in this Privacy Policy.

**2. Personal Information and Privacy Policy Coverage**
“**Personal information**” or “**personal data**” means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.

This Privacy Policy applies to all Personal Information collected by Island Escapes in relation to its customers, suppliers and other third parties (‘external parties’ or ‘you’). In this policy, Island Escapes outlines:

* what types of Personal Information Island Escapes collect and hold;
* the purposes for which Island Escapes collect, hold, use and disclose Personal Information;
* how Island Escapes collect Personal Information;
* how you may access, update, and/or complain in relation to the Personal Information that Island Escapes hold in relation to you and seek any correction to that information;
* how Island Escapes’ collections, uses stores, and discloses credit information and commercial credit eligibility information;
how Island Escapes disclose Personal Information; and
* disclosure of Personal Information to overseas recipients.

**3. Purpose of Collecting, Holding or Using Personal Information**

* Island Escapes collects, holds, discloses and uses your Personal Information:
to provide you with booking services;
* to provide, assist and facilitate Island Escapes and/or its suppliers, and/or third parties who provide customer service to you;
* to provide, assist and facilitate Island Escapes and/or its suppliers, and/or third parties who provide information technology services such as airline related systems, data storage, distribution services, passenger and freight booking and processing systems, communication networks, software and system development, maintenance and support, and information processing, analysis and reporting;
* to provide, assist and facilitate Island Escapes and/or its suppliers, and/or third parties who provide services in the course of investigating a complaint or a security incident;
* to provide, assist and facilitate Island Escapes and/or its suppliers, and/or external service providers, including those providing billing services, catering services, chauffeur services, airport lounge operations, and ground handling services (such as check-in agents, freight handling and special assistance);
* to administer Island Escapes’ relationship with you including responding to queries;
* for internal administrative purposes, such as but not limited to procedural assessment, risk management, staff training, accounting, billing, product and service reviews;
* to assist and facilitate
* to comply with legislative requirements such as under the *Personal Property and Securities Act 2009 (Cth)*;
* to monitor activity on Island Escapes website(s);
* to identify and inform you about other products or services that may be of interest to you;
* to provide you with information about products, services and offerings that may be of interest to you;
* to distribute our newsletters and other communications either directly or with the assistance of third party services providers;

By submitting your Personal Information to Island Escapes, you consent to Island Escapes using your Personal Information in the above ways.

**4. Types of Personal Information Island Escapes collect and hold**

The types of Personal Information Island Escapes may collect from our external parties and hold include (without limitation):

* Your name, gender, date of birth, contact details, address, image, drivers licence, postcode, copy signature;
* Passport photo, passport details and signature along with accompanying VISA information (if any);
* Flight and other travel details;
* Billing address and email address(es);
* Telephone numbers;
* Frequent flyer number or other loyalty program membership details;
* Dietary requirements (if any);
* Social media profile;
* Health information relevant to your travel arrangements;
* Payment details (such as credit/debit card number and expiry date) provided in connection with the purchase of our products and services;
* Insurance provider’s details,
* Company details, company contact details, business premises details;
* Details of the products and service provided;
* Any other information you provide and/or upload or submit to us.

We may automatically collect information from you and your devices when you use our Services. This may include your IP address, the type of browser and device you use to access the Services, the web page you visited before coming to our websites, and other identifiers associated with your devices. Your devices (depending on their settings) may also transmit location information to the Services.

We note that our websites are not designed to respond to “do not track” signals received from browsers.

We may use third-party web analytics services on our Services, such as Google Analytics. These service providers help us analyse how users use our Services.

We may collect information about you from other sources, such as travel agencies, third party service providers whose products integrate with our Services or other independent third parties who are legally allowed to share your information with us.

**5. Cookies**

We use technologies like cookies, pixel tags and web beacons to recognises you when you to visit our website or use our Services and to provide, improve, protect and promote our Services.

What are cookies?

A "cookie" is a small text file which is placed on your computer or device by our webpage servers when you access our Services. The purpose of a cookie is to help analyse web traffic and to allow our Services to respond to you when you return to our Services. Cookies are also used to enhance the secure use of our Services.

Cookies are frequently used and in themselves do not identify the user, just the computer used.

How we use Cookies

When you browse our website or use our Services, we may record geographical tagging, cookies and statistical data. This may include your IP address, date and time of your visit, operating system, language preferences, device characteristics, pages visited, information downloaded and type of browser used to access the Services.

Cookies help us: remember your username for your next visit; remember information regarding your recent drives; and understand how you are interacting with our Services so that we can improve them based on that information.

Web Beacons

We also may use “web beacons” on our Services. A web beacon, also known as a pixel tag or clear GIF, may be used to transmit information collected through cookies to our service providers’ servers, such as the server of Google AdWords. These web beacons enable our service providers to compile anonymous information about your browsing activity on the Services.

Disabling Cookies

You can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. However, if you decide not to display cookies you may not experience optimum performance of our Site.

**6. How Island Escapes Collects Personal Information**
Island Escapes may collect personal information about you as follows:

* when you use services provided by Island Escapes or purchase Island Escapes’ goods;
* make or update a booking to use Island Escapes services;
* register to receive Island Escapes newsletters or other communications,
* visit Island Escapes websites,
* visit Island Escapes social media page(s) or other multimedia platform or otherwise interact with Island Escapes;
* email us or callus;
* comment on our blogs or in community forums; and
* otherwise submit information to us when you use our affiliated or direct website(s), apps, software and/or services that link to this Privacy Policy.

As well as collecting information directly from you, there may be occasions when Island Escapes collects information about you from a third party. These third parties may include:

* Third Parties making bookings on your behalf, or otherwise interact with Island Escapes on your behalf, including when you make an inquiry with a representative agent but do not proceed to a booking;
* Other related entities to Island Escapes;
* Travel Agents and Travel Agency bodies; and
* Publicly available sources of information.

We also collect other information about your online activities and your use of our services automatically from the use of Cookies and Pixel Tags. We may also collect information about you from other sources, such as from third parties. If we receive personal information that we have not requested (unsolicited information) then we will destroy or de-identify the information if it is lawful and reasonable to do so.

**7. Purpose for collecting, holding using and disclosing personal information**

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities and as necessary to provide the Services to you. We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions.

For example, we may use the information obtained through the Services at your request to:

* create and manage your account;
* market features, products, or special events using email or send you marketing communications about third party products and services we think may be of interest to you;
* permit you to participate in blogs, forums, and discussion groups;
* respond to and communicate with you about your requests, questions and comments;
* process the Services we are providing to you; and
* process claims we receive in connection with services.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the Services to you to the best of our ability.

In addition, we use information collected online through the use of cookies, pixel tags and other automated means. This information is used to:

* recognise your device when you use the Services;
* manage our Services;
* offer and provide products, services and information to you;
* operate, evaluate and improve our business;
* analyse your use of the Services;
* personalise the Services, including targeted advertisements that may be of particular interest to you;
* identify users of our Services; and
* gather demographic information about our users.

We use such information to help us to make decisions about maintaining, offering and improving our Services and to assist us in providing an effective service (for example, to adapt our Services to the needs of your device or to allow you to log in to our Services).

Our service providers promise to safeguard your personal information and are not permitted to use it for their own purposes.

Where we wish to use or disclose your personal information for other purposes, we will obtain your prior consent. We may also use your personal information for purposes which are required by law such as sharing your personal information in order to comply with legal obligations to which we are subject.

1. **Automated Decision Making**

We use your personal information to perform automated decision making (including profiling). These decisions are used to improve and make changes to our services and are based on both commercial and non-commercial factors.

1. **Ad Networks**

You may see certain ads on other websites based on your visits to our Services because we may from time to time participate in advertising networks administered by third-party vendors, such as Google AdWords. Ad networks allow us to target our messaging to users considering demographic data, users’ inferred interests and browsing context. These networks track your online activities over time by collecting information through automated means, including through the use of cookies, web server logs and web beacons. The networks use this information to show you advertisements that are tailored to your individual interests, to track your browser across multiple websites, and to build a profile of your web browsing. The information our ad network vendors collect includes information about your visits to websites that participate in the vendors’ advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Services and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

We may use features of Google Analytics for Display Advertisers. That includes obtaining specific visitor cookie data, such as the source, medium and keywords used to visit our Services.

To learn more about how to opt out of ad network interest-based advertising, contact us using our contact details in section 17 & 18 of this Privacy Policy.

1. **Marketing**

We may use your information to offer you products and services that we think may be of interest to you, unless you have opted out of marketing communications.

Where required by applicable law, we will obtain your consent before sending you any marketing communications. You may withdraw your consent to the use of your data for marketing purposes at any time by contacting us on our contact details in section 17 & 18 of this Privacy Policy.

We will never provide your information to third parties for marketing purposes without receiving your consent

1. **Lawful Basis for Processing Your Information**

If European Data Protection Laws applies, our lawful basis for collecting and using the information described in this Privacy Policy will depend on the information concerned and the specific context in which we collect or use it.

We normally collect or use information from you where we have your consent to do so, where we need the information to perform a contract with you or to provide our services or products to you upon your request, or where the processing is in our legitimate interests and not overridden by your data protection interests or rights and freedoms.

For example, when we:

* use information to create and manage your account, we need it in order to provide the relevant services;
* use information to effect a transaction you have requested, we need it in order to provide you with the product or services you are purchasing;
* use names and email addresses for email marketing purposes, we do so with your consent (which you can revoke at any time); and
* gather usage data and analyze it to improve the Services and services, we do so based on our legitimate interest in safeguarding and improving our Services and services.

If you have questions about or need further information concerning the lawful basis on which we collect and use your personal information, please contact us using the contact details in section 17 & 18 of this Privacy Policy.

1. **Disclosure of Information**

Island Escapes understands the importance of keeping Personal Information private, and will only disclose such information to others in limited circumstances. Other parties to which Island Escapes may disclose Personal Information include:

* Island Escapes’ related parties;
* Island Escapes’ professional advisers;
* government and regulatory authorities;
* foreign government and regulatory authorities;
* Island Escapes related entities;
* Airlines and their associated entities;
* Island Escapes’ suppliers and/or third parties who provide customer service to you;
* Island Escapes’ suppliers, and/or third parties who provide information technology services such as airline related systems, data storage, distribution services, passenger and freight booking and processing systems, communication networks, software and system development, maintenance and support, and information processing, analysis and reporting;
Island Escapes’ suppliers, and/or third parties who provide services in the course of investigating a complaint or a security incident;
* Island Escapes’ suppliers, and/or external service providers, including those providing billing services, catering services, chauffeur services, airport lounge operations, and ground handling services (such as check-in agents, freight handling and special assistance);
* Island Escapes’ third party corporate service providers (i.e. webmaster, graphic designers etc);
* Trade Credit Insurance Providers; and
* Credit Reporting Bodies (default information).

In connection with (or for reasons directly related to) any of the purposes set out in this policy. Island Escapes also discloses Personal Information to contractors who provide services to Island Escapes or who manage services provided to an individual on Island Escapes’ behalf. Personal Information is only disclosed to contractors to the extent necessary to enable them to provide these services.

Island Escapes may be permitted or obligated to disclose Personal Information to other third parties where:

* Island Escapes reasonably believes that the disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety and it is unreasonable or impracticable to obtain your consent to the disclosure;
* there is reason to suspect that unlawful activity, or misconduct of a serious nature, is occurring and that the disclosure is necessary for Island Escapes to take appropriate action in relation to this matter;
* Island Escapes is required or authorized to do so by law and/or an enforcement body; or
as otherwise permitted by the Privacy Act.

Under no circumstances will we sell personal information without the consent of the person to whom it relates. Such consent, if given, may be withdraw at any time by contacting us using our contact details in section 17 & 18 of this Privacy Policy.

Third Party Analytics Services

We may use third-party web analytics services on our Services, such as Google Analytics. These service providers help us analyse how users use our Services. The information collected for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers. These service providers may retain and use anonymised, aggregated data collected from users of our Services in connection with their own businesses, including in order to improve their products and services.

To learn more about opting out of data collection through analytics services such as Google Analytics, please contact us using our contact details in section 17 & 18 of this Privacy Policy.

Social Media plug-ins

We use the following social media plug-ins as part of our Services:

* Facebook;
* Instagram;
* Twitter;

Company reorganisation

In the event that we undergo reorganisation or are sold to a third party, any personal information we hold about you may be transferred to that re-organised entity or third party in compliance with applicable law.

**13. How Island Escapes Hold Information and Keep it Secure**
Island Escapes holds your personal information in a combination of hard copy and electronic files. Island Escapes use third party information system providers who may store or have access to your personal information.

Island Escapes has physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference and loss, and from unauthorized access, modification and disclosure.
Island Escapes may combine personal information it receives about you with other information Island Escapes holds about you. This includes information received from our related entities and/or third parties.

The steps we take to protect your personal information include the following:

* data held and stored on paper is stored in lockable offices and in secure premises;
* data held and stored electronically is protected by internal and external firewalls, limited access via file passwords, and files designated read-only or no access;
* when transferring information to others, we ensure that appropriate and suitable safeguards and data protection measures are in place to protect your personal information;
* where we disclose personal information to third parties our contractual arrangements with them include specific privacy requirements;
* only authorised personnel will have access to personal information;
* our staff receive training on privacy procedures.

Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via our website whilst it is in transit over the internet and any such submission is at your own risk.

**Disclosure to overseas recipients**
In the course of providing services to you, Island Escapes may disclose your personal information to suppliers, service providers and third parties located overseas who provide service(s) in connection with your booking and any associated travel services, along with law enforcement agencies, regulatory authorities and governments for security, customs and immigration purposes. These parties may be located in any country to which you travel to or through.
Island Escapes may also disclose your personal information to data processors (including operators of global travel distribution systems) and customer service providers located overseas. The countries in which these third parties are located include, but are not limited to, Fiji, Samoa, Vanuatu and Thailand. Island Escapes deals with many different service providers all over the world, so it is not possible for Island Escapes to set out in this Policy all of the different countries to which Island Escapes may send your personal information. However, if you have any specific questions about where or to whom your personal information will be sent, please refer to the “Our Contact” section below. By using our Services you consent to such disclosure. We will only disclose your information to such locations if permitted by law. If your personal information is disclosed to another country we will ensure that any disclosure is in accordance with the relevant laws, and that appropriate safeguards are put in place.

**14. Retention and destruction of Personal Information**
Island Escapes maintains procedures and standards and takes reasonable steps to prevent unauthorized access to, use, modification, or disclosure of, Personal Information. Island Escapes takes reasonable steps to protect an individual’s information from misuse, interference or loss including the use of firewalls, anti-virus software and ongoing internal monitoring. Once an individual’s information is no longer needed by Island Escapes, reasonable steps are taken to destroy or de-identify it (except where archiving is required for the purposes for which the information was collected).

We will also retain personal information to ensure compliance with any applicable statutory or regulatory obligations imposed on us in relation to the retention of records.

Where you have requested we stop processing your personal information for marketing purposes, we may retain a record of your request to ensure we abide by your request in the future.

1. **Your Rights**

Under the legislation applicable to you, you may be entitled to exercise some or all of the following rights:

1. Request (i) information as to whether your personal information is retained and (ii) access to and/or duplicates of your personal information retained, including the purposes of the processing, the categories of personal information concerned, and the data recipients as well as potential retention periods.
2. Request rectification, erasure, removal or restriction of your personal information, for example, because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the processing was based has been withdrawn.
3. Refuse to provide us with, or withdraw, your consent to processing of your personal information at any time.
4. Object, on grounds relating to your particular situation, that your personal information shall be subject to processing. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you we will either stop processing your personal information or present you our compelling legitimate grounds for an ongoing processing.
5. Object to us sending you direct marketing and profiling you for the purpose of direct marketing.
6. Object to your data being subject to any automated decision making, including profiling (decisions based on data processing by automatic means, for the purpose of assessing several personal aspects).
7. In certain circumstances receive your personal information that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from us.
8. Lodge a complaint regarding our processing of your personal information with a relevant authority in a country where you live, work, or where you believe a breach may have occurred, or take legal action in relation to any potential breach of your rights regarding the processing of your personal information.

If you wish to contact us in relation to any of the rights outlined in this section, you can do so by contacting us using our contact details in section 17 & 18 of this Privacy Policy.

1. **Children**

Our Services are not directed at children under the age of 16.

If we learn that we have collected personal information of a child under 16 years old we will take steps to delete such information as soon as possible unless consent is given or authorised by the holder of parental responsibility over the child. If such consent is provided, the personal information will only be collected and used to the extent of the consent given.

1. **Contact Island Escapes Privacy Officer and Further Information.**

If you are not satisfied with Island Escapes’ response, you may also contact the Office of the Australian Information Commissioner: by email: enquiries@oaic.gov.au ; by phone: 1300 363 992; by writing: GPO Box 2999, Canberra, ACT 2601 or GPO Box 5218, Sydney, NSW 2001

1. **Our Contact Details**

You can contact us by email at: marilyn@islandescapes.com.au or by writing to: Privacy Officer, Island Escapes P.O. Box 486, ASHBURTON VIC 3147 Ph: (03) 9809 8777 Fax: (03) 9809 8778