



## Privacy Policy

Last Updated: March 26

This Privacy Policy of Golf & Tours Pty Ltd (ACN 616 767 063) (**Golf & Tours, us, we, our**) sets out how we treat the Personal Information that we collect, use and disclose and our procedures regarding the handling of Personal Information, including the collection, use, disclosure and storage of information, as well as the right of individuals to access and correct that information. We operate the website called Golf & Tours, which includes the website with domain name <https://golfandtours.com/> (**Platform**). We provide tailored golf travel services, including curated golf holiday packages and tours to premium domestic and international destinations (**Services**).

We may collect Personal Information in order to conduct our business, to provide and market our Services and to meet our legal obligations. By using the Platform or our Services, or by providing any Personal Information to us, you consent to the collection, use and disclosure of your Personal Information as set out in this Privacy Policy. When visiting our website or engaging our Services, we handle personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APP(s)**).

From time to time, we may revise or update this Privacy Policy or our information handling practices. If we do so, the revised Privacy Policy will be published on the Platform.

### The types of information

**Personal Information** has the meaning given to it under the Privacy Act, which may include information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (i) whether the information or opinion is true or not; and
- (ii) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this privacy policy.

**Sensitive Information** has the meaning given to it under the Privacy Act, which may include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by us only:

- (i) for the primary purpose for which it was obtained;

- (ii) for a secondary purpose that is directly related to the primary purpose; and
- (iii) with your explicit consent or where its collection, use or disclosure is required or authorised by law.

### **The types of Personal Information and Sensitive Information we collect and hold**

The types of Personal Information we may collect and hold includes (but is not limited to) Personal Information about:

- your name, date of birth, address, contact telephone number, identification and other contact details such as your email address and emergency contact details;
- travel and tour information, including but not limited to, activity preferences, flight numbers and arrival/departure details;
- payment information (such as credit card or bank details);
- other Personal information required to provide our Services in specific cases; and
- details of your use of our products or Services.

The types of Sensitive Information we may collect and hold includes (but is not limited to) Sensitive Information about:

- your health and medical information, including but not limited to mobility requirements, medical diagnoses, allergies and dietary requirements, medical conditions, vaccination records and any additional information related to health and wellbeing; and
- other Sensitive Information required to provide our Services in specific cases.

You are not obliged to provide Personal Information or Sensitive Information to us. However, in many cases, if you do not provide us with the necessary information, we may not be able to supply the relevant functionality of the Platform or our Services effectively.

In some circumstances, you may provide to us, and we may collect from you, Personal Information or Sensitive Information about a third party. Where you provide the Personal Information or Sensitive Information of a third party, you must ensure that the third party is aware of this Privacy Policy, understands it and agrees to accept it. If you are providing us with Personal Information or Sensitive Information on behalf of a person who is under the age of 18 that you are the parent or guardian of, you understand that you are consenting to this Privacy Policy on their behalf as their legal guardian.

If it is necessary to provide specific services to you, we may collect Sensitive Information about you. However, we will only collect Sensitive Information from you if you agree to provide it to us, you authorise us to obtain it from a third party or where the collection of the information is required or authorised by or under an Australian law or a court/tribunal order or otherwise where the collection is not prohibited under Australian law.

### **Anonymity and Pseudonymity**

Where lawful and practicable, you may choose to remain anonymous or use a pseudonym when dealing with us. For example, you may browse our website without identifying yourself. However, if

you do not provide certain Personal Information, we may not be able to provide you with our Services, respond to your enquiries, or otherwise engage with you in a meaningful way.

### **How Personal Information and Sensitive Information is collected and held by us**

We collect Personal Information and Sensitive Information in the following ways:

- when you fill in and return to us a signed form;
- when you visit our website;
- when you submit Personal Information and Sensitive Information through the Platform (such as when you send us a message or fill out an online form) or provide it to us in any other way;
- in person, for example, when you engage with our employees, contractors, facilitators, agents, or customer service representatives; and
- in the course of providing the Services to you.

While we limit the collection of Sensitive Information to what is necessary for our Services, we do collect Sensitive Information as outlined above, particularly concerning your health and medical conditions. When we collect Sensitive Information, we will always comply strictly with the Privacy Act and APPs, and obtain your explicit consent unless otherwise permitted or required by law.

### **Collection of Personal Information through activity**

Information that may identify you as a user may be gathered during your access to the Platform.

The Platform may include pages that use “cookies”. A cookie is a unique identification number that allows the server to identify and interact more effectively with your computer or device. The cookie assists us in identifying what our users find interesting on the Platform.

A cookie may be allocated each time you use the Platform. The cookie does not identify you as an individual in our data collection process; however, it does identify your internet service provider.

You can configure your access to the Platform to refuse cookies. If you do so, you may not be able to use all or part of the Platform.

### **The purposes for which we collect, hold, use and disclose Personal Information and Sensitive Information**

We collect, hold, use and disclose Personal Information and Sensitive Information for a variety of business purposes including:

- to provide our Services and other products or services you have requested from us;
- to share your Sensitive Information with activity providers solely for health or safety purposes, under confidentiality obligations;
- to manage safety and emergency situations;
- to improve our business, products and Services;

- to promote our business to you;
- to market our other services or products to you;
- to handle and respond to your enquiries, complaints or concerns;
- to comply with legal obligations; and
- to provide Personal Information and Sensitive Information to third parties as set out in this Privacy Policy, only where necessary, with appropriate safeguards and your consent where required by law.

We use your information only for the purpose for which it was collected, or a related purpose you would reasonably expect. Otherwise, we will ask for consent or rely on another APP exception.

### **Use of photos, images and other multimedia content**

We may photograph, film, or otherwise create multimedia content (**Content**) in connection with our Services. Any Content in which you are reasonably identifiable may be used by us for the purpose of promoting Golf & Tours and our Services, including in marketing materials, on our website, on social media channels, and in any other medium we consider appropriate.

If you do not wish to be included in Content where you are reasonably identifiable, you must notify us at the start of the tour or at any time using the contact details in this Privacy Policy. We will take reasonable steps to respect your request, including avoiding capturing you in Content or removing Content in which you are clearly identifiable, except where required by law.

### **Direct marketing**

We also collect, hold, use and disclose your Personal Information to:

- notify you about the details of new services and products offered by us;
- send you our newsletters and other marketing publications;
- administer our databases for client service, marketing and financial accounting purposes; and
- to comply with our legal requirements regarding the collection and retention of information concerning the products and Services that we provide.

By using the Platform, you consent to the receipt of direct marketing material. If you do not wish to disclose your Personal Information for the purpose of direct marketing or you would like to opt-out of receiving direct marketing communications, you can do so by contacting us using the contact details set out below, or by following the instructions to unsubscribe which are contained in a communication that you receive from us. We will process your opt-out request promptly within a reasonable time period.

We may use your Personal Information (but never Sensitive Information) to contact you about our Services, updates, and promotions.

### **Third Party Service Providers**

We may disclose your Personal Information, and where necessary, Sensitive Information to third parties who work with us in our business to promote, market or improve the Services that we provide, including:

- accommodation providers, golf courses and clubs, tour operators, transfer and transport operators, travel insurance providers and other related service providers;
- providers of customer relations management database services and marketing database services;
- cloud hosting providers, analytics providers and professional advisers who assist us in operating our business and delivering our Services;
- marketing consultants, promotion companies and website hosts;
- partnered businesses;
- payment processors and financial institutions;
- government authorities; and
- linked service providers.

We use third-party payment service providers to process transactions securely. These providers may collect and store your payment details in accordance with their own privacy policies.

We may also combine your Personal Information with information available from other sources, including the entities mentioned above, to help us provide better services to you.

Where we do share information with third parties, we require that there are contracts in place that only allow use and disclosure of Personal Information to provide the service and that protect your Personal Information and Sensitive Information in accordance with Australian law. Otherwise, we will disclose Personal Information and Sensitive Information to others if you have given us permission, or if the disclosure relates to the main purpose for which we collected the information, and you would reasonably expect us to do so.

### **How we store, hold, and protect your Personal Information and Sensitive Information**

We store Personal Information and Sensitive Information in computer storage facilities and paper-based files.

We take reasonable steps to protect your Personal Information and Sensitive Information against loss, unauthorised access, use modification or disclosure. Some examples of the steps we take to protect your Personal Information and Sensitive Information include:

- ensuring there are suitable password protection measures and access privileges in place to monitor and control access to our IT systems;
- imposing restrictions on physical access to paper files;
- requiring any third parties engaged by us to provide appropriate assurances to handle your Personal Information and Sensitive Information in a manner consistent with Australian law; and
- taking reasonable steps to destroy or de-identify Personal Information and Sensitive Information after we no longer need it for our business or to comply with the law.

However, most of the Personal Information and Sensitive Information that is stored in our client file and records will be kept for a minimum of seven years to fulfil our record-keeping obligations.

The APPs:

- permit you to obtain access to the Personal Information or Sensitive Information we hold about you in certain circumstances (**APP 12**); and
- allow you to correct inaccurate Personal Information or Sensitive Information subject to certain exceptions (**APP 13**).

Where you would like to obtain such access, please contact us in writing on the contact details set out at the bottom of this Privacy Policy.

### **Overseas Disclosure**

We may disclose your Personal Information and Sensitive Information to overseas recipients, including our cloud hosting providers, analytics service providers, transport provider, overseas suppliers and service providers, email and communications platforms, payment processors, and other technology service partners who assist us in providing our Services. These recipients may be located in countries, including but not limited to the United States, the United Kingdom, Europe, Asia-Pacific region, South Africa and other jurisdictions in which our service providers operate.

Where we disclose Personal Information and Sensitive Information to an overseas recipient, we take reasonable steps to ensure that the recipient handles Personal Information in a way that is consistent with the APPs or is otherwise bound by privacy protections that are substantially similar. This may include contractual commitments, technical safeguards, access controls and audits on the recipient's privacy and security practices.

By providing your Personal Information or Sensitive Information to us, you acknowledge that overseas recipients may not be subject to Australian privacy laws. To the fullest extent permitted by law, we are not liable for any breach of the Privacy Act or APPs by such recipients.

### **Children's Privacy**

Golf & Tours tours are primarily designed for adults. However, children may participate in certain tours (for example, as part of a private family booking).

Where a child participates in a Golf & Tours tour, we will handle the child's Personal Information and Sensitive Information in accordance with the Privacy Act and the APP.

We will obtain consent from a parent or legal guardian before collecting Personal Information or Sensitive Information about a child, unless the child has sufficient maturity and understanding to provide their own consent under applicable law.

We will only collect Personal Information or Sensitive Information that is reasonably necessary for the child's participation in the tour, including information relating to safety, health, comfort and administration (for example, name, age, medical conditions, dietary requirements and emergency contact details).

We will only use or disclose a child's Personal Information for the primary purpose of collection (including tour administration and safety), or for related purposes that would be reasonably expected, unless otherwise required or authorised by law.

We will not use or disclose a child's Personal Information for direct marketing purposes without the express consent of a parent or legal guardian.

Subject to applicable law, parents and legal guardians may:

- request access to the Personal Information we hold about their child;
- request correction of inaccurate, out-of-date or incomplete information;
- request deletion of Personal Information where it is no longer required for a lawful purpose; or
- withdraw previously provided consent (noting that this may affect the child's ability to participate in a tour).

We will respond to such requests in accordance with the APP and our Privacy Policy.

### **Data Retention**

We store, process, and retain your information only for as long as we need it for the purposes described in this Privacy Policy. When we no longer need your information, we take reasonable steps to destroy or de-identify it, unless we are required or authorised by law to retain your information for a longer period.

### **Data Breaches**

We are required to comply with the Notifiable Data Breaches scheme under the Privacy Act. If we experience an eligible data breach involving your Personal Information, we will take reasonable steps to investigate the breach, and where required, notify you and the Office of the Australian Information Commissioner (**OAIC**) of the circumstances and the steps you can take to protect your information.

### **How we handle requests to access your Personal Information or Sensitive Information**

You have a right to request access to your Personal Information and Sensitive Information which we hold about you and to request its correction. You can make such a request by contacting us using the contact details set out in this policy.

We will respond to any such request for access as soon as reasonably practicable. Where access is to be given, we will provide you with a copy or details of your Personal Information and Sensitive Information in the manner requested by you where it is reasonable and practicable to do so.

We will not charge you a fee for making a request to access your Personal Information and Sensitive Information. However, we may charge you a reasonable fee for giving you access to your information.

In some cases, we may refuse to give you access to the information you have requested or only give you access to certain information. If we do this, we will provide you with a written statement setting out our reasons for refusal, except where it would be unreasonable to do so.

## **How we handle requests to correct your Personal Information and Sensitive Information**

We will take such steps (if any) as are reasonable in the circumstances to make sure that the information we collect, use or disclose is accurate, complete, up to date and relevant.

If you believe the information that we hold about you is inaccurate, irrelevant, out of date or incomplete, you can ask us to update or correct it. To do so, please contact us using the contact details listed below.

## **How to contact us or make a complaint**

If you have any questions about this Privacy Policy, if you wish to correct or update information we hold about you or if you wish to request access or correction of your Personal Information or Sensitive Information, or make a complaint about a breach by us of our privacy obligations (including the way we have collected, disclosed or used your Personal Information and Sensitive Information), please contact:

Attention: Managing Director  
Ainslie Saunders  
hello@golfandtours.com  
+61 2 9956 3866  
119 Willoughby Road, Crows Nest, NSW 2065 Australia

We will acknowledge and investigate any complaint regarding our management of information within 30 days. Where we identify a failure to comply with our privacy obligations, we will take reasonable steps to remedy the issue.

If your complaint is found to be substantiated, we will consult with you to determine and implement appropriate corrective action.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**) under section 36 of the Privacy Act at:

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992