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[www.alpinespirit.com.au](http://www.alpinespirit.com.au)



## Privacy Policy

### 1. Copyright

This site is protected by Australian and International copyrights in graphics, design, typography, layout and content. Information on this site may not be reproduced in whole or in part or form without the written consent of Alpine Spirit Coaches.

### 2. Effective

01 April 2020

### 3. Purpose

Alpine Spirit Pty Ltd (ACN 147 456 648) and its related entities (trading as "Alpine Spirit Coaches", or collectively referred to as "we", "us", "our") are committed to good privacy practice.

We respect and understand that you care about how information about you is used and shared. This policy provides an explanation of how we handle your personal information. In certain circumstances, other policies may apply instead of, or in addition to, this privacy policy.

By using our websites and/or providing your personal information to us by any other means, you consent to us handling your personal information in accordance with this policy.

### 4. Collection of Personal Information

We may collect personal information about you in the course of your dealings with us (e.g. if you make an enquiry or make a booking). We only collect personal information that is necessary for our business functions, which may include:

- providing you with travel services;
- answering your queries;
- arranging and paying for travel, accommodation and/or other activities on your behalf;
- providing, administering, improving and personalising our products and services;
- product reviews, data analysis, business consulting, auditing, archiving, printing, delivery and mailing services;
- fraud prevention and credit checks.

We may also collect other personal and sensitive information from you (e.g. if you apply for employment with Alpine Spirit Coaches, then we may collect information including but not limited to; your resume; skills and qualifications; education provider history; work history and/or residency status.)

We collect most personal information directly from you, by way of written forms, our websites, by telephone, in person, by our representatives, and other correspondence (such as letters and emails).

We may also collect personal information about you from third parties, including travel agents, booking agents, travel representatives, market research companies, and brochure distribution companies.

The specific types of personal information collected and used by Alpine Spirit Coaches varies according to the purpose for collection, but in general this information includes, but may not be limited to:

- your name, address, and contact details (e.g. telephone number and email address);
- demographic information such as age, gender, and residential location;
- credit card details and/or pensioner/concession information (if applicable);
- travel, accommodation and activity details;
- vehicle details (e.g. model, make and registration);
- any health issues that may be relevant in relation to your proposed travel or activity arrangements;
- dietary requirements (if any);
- any other special requirements that you may have; and
- information from web browsers when you visit our websites, such as server address, domain name, pages visits, the page you came from, type of browser used, and selected information for statistical purposes.



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If you provide us with personal information about a third party you represent, we collect it on the basis that you have that person's consent for us to collect and handle their personal information in accordance with this privacy policy.

If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide products or services to you.

#### **5. Dealing with us anonymously**

You have the right to deal with us anonymously, or under a pseudonym, unless it is impracticable for us to do so or if we are required by, or authorised under, an Australian law to only deal with individuals who have identified themselves.

If you wish to deal with us anonymously, we may be unable to accommodate your request. Please contact us using the details in Section 13 below if you would like us to consider your request to remain anonymous.

#### **6. Use and disclosure of Personal Information**

We will use and disclose your personal information for the purposes for which we collected it, and/or for other related purposes that you would reasonably expect. Generally, these purposes include, but are not limited to:

- processing travel, accommodation and activity bookings, and to facilitate other transactions relating to those arrangements;
- providing you with marketing information about the goods and services offered by Alpine Spirit Coaches and third parties;
- maintaining a relationship with you as a member of our individual companies' email databases or other marketing databases or member programs;
- surveys and other market research to assist us in assessing and improving our services; and
- where required for administrative purposes and all other purposes reasonably associated with our business.

By providing us with your personal information, you consent to us using your personal information for the above purposes. You agree that we may send you such information by post or by electronic means (including email and SMS). You can opt-out of marketing and promotional communications at any time using an opt-out mechanism in one of our communications, or by contacting us using the details shown in Section 13 below.

We may exchange your personal information with related entities in the Alpine Spirit Coaches group. We may disclose your information to third party contractors and service providers for the above purposes, including entities located overseas (e.g. email handling providers, financial and credit service providers, market research providers, cloud service providers and/or IT solution providers).

From time to time, Alpine Spirit Coaches may partner with other businesses to jointly offer products or services. If you purchase or express interest in a jointly-offered product or service from Alpine Spirit Coaches, we may share your personal information collected in connection with your purchase or expression of interest with our joint promotion partner(s). We do not control our business partners' use of your personal information. Their use of the information will be in accordance with their own privacy policies.

Apart from the above instances, we may also use and disclose your personal information with your consent and as otherwise required at law.

#### **7. Sensitive Information**

We will only collect Sensitive Information with your consent. We will assume that you have consented to us collecting any information that you provide to us for use in accordance with this policy, unless you tell us otherwise at the time you provide it to us.

'Sensitive information' is information about a person's racial or ethnic origin, political opinions, membership to a political association, religious beliefs or affiliations, philosophical beliefs, membership to a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic information or biometric information.



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## 8. Cookies

Each of our websites uses cookies to make your use of the website easy and meaningful. Cookies do not personally identify you; they merely recognise your Web browser. Unless you choose to identify yourself to Alpine Spirit Coaches, either by responding to a promotional offer, opening an account, sending an email or filling out a Web form (such as a "Contact Us" Web form), you remain anonymous.

## 9. Data Quality, Storage and Security

Personal information is held in both electronic and hard copy records, which are stored securely at our facilities or by contracted partners. We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our websites. Please bear this in mind when transmitting information via our websites.  
Access and Correction

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading. Please contact our Privacy Officer via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the law permits us to deny access. Any such requests must be made in writing to Alpine Spirit Coaches via the details in Section 13 below. No fee will be incurred for requesting access, but if your request for access is accepted, we will inform you of the fee (if any) that will be payable for providing access if you proceed with your request.

## 10. Complaints, Concerns or Further Information

If you have any other queries or concerns regarding your privacy and the way we handle your personal information, please contact Alpine Spirit Coaches Privacy Officer using the contact details below (Section 13). We will endeavour to provide you with further information, or in the case of a complaint we will investigate your complaint and provide you with a response, generally within 14 days.

## 11. Overseas disclosure of your personal information

Some of our third-party contractors and services providers are located outside of Australia. Where we do disclose your personal information outside Australia, the countries in which such recipients are likely to be located are the United States of America, the United Kingdom, Europe, India and Japan.

## 12. Changes to Privacy Policy

Alpine Spirit Coaches may review and update this Privacy Policy from time to time to reflect changes in the law, our business practices, procedures and structure, and the community's changing privacy expectations. The latest version of the Privacy Policy will be available on our website at [www.alpinespiritcoaches.com.au](http://www.alpinespiritcoaches.com.au). You may also contact Alpine Spirit Coaches Privacy Officer to obtain the latest version of the Privacy Policy at any time.

## 13. Point of Contact

To request access to personal information that we hold about you, to make a privacy related complaint, to obtain more information about this Privacy Policy or to enquire about privacy matters generally, please contact Alpine Spirit Coaches Privacy Officer as follows:

The Privacy Officer, Alpine Spirit Coaches, 4 Buffalo River Rd, Myrtleford VIC 3737

Email: [office@alpinespiritcoaches.com.au](mailto:office@alpinespiritcoaches.com.au)

Phone: +61 3 5752 1333