

Privacy Policy

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About This Policy

Eastern Air Services (EAS) understands how important the privacy of your personal information is to you and we are committed to ensuring its privacy.

This Privacy Policy explains, in general terms, how EAS collects, holds, uses and discloses your personal information in accordance with the *Privacy Act 1988 (Cth)* (Act) including the Australian Privacy Principles set out in the Act.

EAS also provide specific privacy collection notices relating to our particular services and practices, where required under Australian Privacy Principle 5 (“Privacy Statements”).

EAS will ensure that all officers, employees and subcontractors are aware of and understand our obligations as well as their own obligations under the Act. We will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent personal information from being collected, used, disclosed, retained, accessed or disposed of improperly.

This Policy applies to all of your dealings with us, whether in person, or via telephone, email, correspondence or our website.

The purpose of this Policy is to:

- give you a better and more complete understanding of the kinds of personal information we collect and hold;
- clearly and concisely communicate how and when we collect, disclose, use, store and otherwise handle personal information;
- inform you about the purposes for which we collect, hold, use and disclose personal information;
- provide you with information about how you may access your personal information, and seek correction of your personal information;
- provide you with information about how you may make a complaint, and how we will deal with any such complaint;
- advise you of the circumstances in which we are likely to disclose personal information to overseas recipients; and
- enhance the transparency of our operations.

For the purpose of this Policy, the following terms will have the following meanings, as attributed to them by section 6 of the Act:

Health Information means:

- (a) Information or an opinion about:
 - (i) The health of disability (at any time) of an individual; or
 - (ii) An individual's expressed wishes about the future provision of health services to him or her; or
 - (iii) A health service provided, or to be provided, to an individual; that is also personal information; or
- (b) Other personal information collected to provide, or in providing, a health service; or
- (c) Genetic information about an individual in a form that is, or could be predictive of the health of the individual or a genetic relative of the individual.

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information or opinion is recorded in a material form or not;

Sensitive Information means:

- (a) Information or an opinion about an individual's:
 - (i) Racial or ethnic origin; or
 - (ii) Political opinions; or
 - (iii) Membership of a political association; or
 - (iv) Religious beliefs or affiliations; or
 - (v) Philosophical beliefs; or
 - (vi) Membership of a professional or trade association; or
 - (vii) Sexual orientation or practices; or
 - (ix) Criminal recordthat is also personal information; or
- (b) Health information about an individual; or
- (c) Genetic information about an individual that is not otherwise health information;
- (d) Biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

Collecting your Personal Information

Types of Information Collected

The personal information EAS collect depends on our relationship with you, the circumstances of collection and the type of service you request from us. It may include:

- Your personal and contact details; examples include:
 - name,
 - residential address,
 - postal address,
 - email address;
 - home, work, and mobile telephone number;
 - date of birth,
 - gender,
 - your occupation and business address;

- passport or other identification details and photograph;
- Payment information related to your flights or additional products or services purchased through our website, our Call Centre or Authorised Agent; examples include:
 - credit card details;
 - details of your bank or financial institution account;

Any such financial information is destroyed within a reasonable period of time after we have processed your payment.

- itinerary and other travel related information (including any dietary and special assistance requirements and your preferences with respect to your travel on our flights);
- Frequent Flyer Loyalty Program membership number and membership details;
- IP address or MAC address when using our website or mobile applications or alternatively, any information that you allow a social media site to share with us (if you interact with us via social media); and
- information relating to your dealings with us.

EAS will not ordinarily ask you to provide sensitive information. However, there may be circumstances where the information provided by you reveals sensitive information. We will only collect sensitive information in circumstances where:

- it is reasonably necessary for one or more of the goods or services we provide or functions we carry out; and
- you consent to the collection of the information; or
- we are required or authorised by law to collect the sensitive information.

EAS will, if it is reasonable or practicable to do so, collect your personal information directly from you. This may happen when you fill out an online form, booking form, or when you give us personal information in person, via telephone, email, correspondence, our website or via an Authorised Agent. Sometimes we will collect personal information from a third party or a publicly available source. For example, we may need to collect personal information from a credit reporting agency. If we receive personal information that we did not solicit, we will determine as soon as reasonably practicable whether we could have lawfully collected that information as part of our functions or activities. If we are not satisfied that we could have lawfully collected the information, then we will (if it is lawful and reasonable) destroy the information or ensure it is de-identified.

Health and Other Sensitive Information

EAS may collect health or other sensitive information about you:

- where relevant to your travel arrangements. For example: if you make a Special Assistance request, provide dietary requirements or otherwise provide us with health information;
- if you have a medical condition and are required to complete a medical clearance form; or
- if you are involved in a safety investigation, complaint or claim.

Subject to the circumstances of the collection, we collect health information for the following purposes:

- ascertaining your health requirements relevant to your flight, and make any Special Assistance or other travel arrangements necessary to assist you;
- processing your medical clearance form;
- investigating safety incidents or accidents, complaints or claims.

By providing your health information to us, you consent to us collecting your health information and using and disclosing it for the purposes set out in this Privacy Policy. We will not use your health information for marketing purposes.

How EAS Collect Information

EAS collect your personal information in a variety of ways. We may collect your personal information directly from you or in the course of our dealings with you. For example, when you:

- provide us with your personal information to: use our services, make or update a booking, tell us about your preferences when flying with us, subscribe to our email or other communications, provide feedback to us or complete a survey or otherwise interact with us, enter a competition;
- visit our website, social media channels or mobile applications;
- apply for a position with us or apply to undertake flight training services;
- complete a form for us such as medical clearance, claim and unaccompanied minor forms; or
- contact our Call Centre.

Whenever possible, EAS will collect information directly from you. However, there may be occasions when we collect information about you from someone other than you. This may include:

- Travel or Authorised Agents and other people who make, change or enquire about a flight or booking on your behalf, or otherwise interact with us on your behalf, including when you make an inquiry with a Travel or Authorised Agent but do not proceed to a booking;
- our service providers or contractors (for example: ground handlers, cargo handlers, catering suppliers, Call Centre operators, marketing and sales agencies and payment fulfillment and fraud protection providers);
- our airline and non-airline partners, including car rental providers, hoteliers, airport transport and parking providers, travel insurance providers;
- third parties who run competitions and other promotions for us or for which we are the sponsor;
- third parties that provide us with marketing leads;
- Government agencies and regulatory authorities, including immigration, customs, border security, police, airport security and other regulatory authorities; and
- recruitment agencies and previous employers, if you have applied for a position with us and with your consent.

EAS may combine personal information we receive about you (whether from you, our airline and other partners, related entities or third parties) with other information that we hold about you.

Why EAS Collect Personal Information

EAS collect your personal information so we can provide you with our services and any products you may request, to contact you and to carry out our functions as an airline. We may use your personal information for the following purposes:

- to process and make arrangements for your flight or booking and any additional products or services you may request during the booking process;
- verification of your identity;
- to communicate with you before and after your flight, including to provide flight updates and request feedback on, but not limited to, our services;
- to distribute our newsletters and other communications either ourselves or with the assistance of third party service providers;
- identifying and arranging benefits for you with our airline and non-airline partners including frequent flyer program recognition and benefits, membership offers and discounts;
- managing and identifying issues of passenger safety, security and requirements including Special Assistance requirements and medical fitness to fly;
- providing and operating our competitions, promotions and events;
- maintaining records and complying with our legal obligations, including laws relating to immigration, customs and border security; and
- to help us continuously improve the services and products we offer.

Disclosure of Your Personal Information

EAS will use and disclose your personal information for the purpose for which it was collected. We may also use or disclose your personal information for a secondary (but related) purpose where you would reasonably expect us to do so, or where we have your consent. We may also disclose your personal information to:

- other airline partners, other airlines and our non-airline partners in regard to your booking or frequent flyer program for partner recognition, benefits, and marketing of those programs;
- our third-party product and service providers, including catering, ground handling, cargo handling, technology and related support services, call centre services, promotions and prize fulfilment services, marketing and advertising services, data analysis and business intelligence services, payment fulfilment and fraud protection and security services;
- Travel or Authorised Agents and other people who make, change or enquire about a flight or booking on your behalf;
- the cardholder of the credit card used to pay for your booking;
- in the event of an emergency or other incident, to government departments and agencies and other support organisations and persons involved in incident response and to your family who contact us seeking information about your travel arrangements;
- where permitted by law or required by law or order of a court or tribunal;
- our professional advisers and insurers; and
- to comply with our legal, audit, reporting and investigation requirements and for operational or regulatory compliance purposes; this includes communications with Australian law enforcement agencies, airport security and border control and other government or regulatory bodies.

If you are an employee of one of our corporate, business or government clients and are travelling for work purposes on a ticket purchased by your employer, EAS may also disclose your travel details and any information associated with your travel (including incident reports) to your employer. If you are travelling on a booking which contains more than one guest, then we will collect your personal information from you or the person who made or updated the booking on your behalf. We may also disclose your personal information to the person who made or updated your booking and other persons included in the booking. Personal information provided to us may be shared with our related companies. We will take all reasonable and practical measures to keep such information strictly confidential. The collection and use of personal information by third parties may be subject to separate privacy policies or the laws of other jurisdictions. We will otherwise handle your personal information in accordance with this Privacy Policy.

Disclosure of Your Personal Information Overseas

EAS may disclose your personal information to organisations, companies, or persons (parties) located outside of Australia. The countries in which these parties may be located will depend on the circumstances, however, in the ordinary course of our business, we may disclose personal information to:

- our third party service providers;
- data processors (including operators of global travel distribution systems); and
- specialised service providers such as web hosting, cloud computing technology and data storage services. If personal information is provided to these suppliers and contractors in order to enable them to perform the agreed tasks, we will make every effort to ensure that the supplier or contractor handles the personal information in accordance with the Act and the Australian Privacy Principles.

Whenever EAS transfer your personal information overseas, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Web-Tracking and Cookies

Cookies are small files or pieces of data sent to and stored on the web browser on your computer and/or any other device you use to access our website. Our website and associated websites (such as our airline partners or those you reach by clicking through our site) may store cookies on your web browser. EAS store cookies to:

- gather statistics relating to the use of our website and so that we may make improvements to site useability. Examples include: page views, the URL of the website you viewed before our website, the type of browser you used to access our website, page views and exit points;

- present targeted, customised and appropriate advertising and marketing to you from us and third parties. For example: we may collect your IP or MAC address, the city associated with your IP or MAC address, the date and time you accessed our website and details of the pages which you visited on our website.

Most web browsers provide a facility which enables you to receive a notification when a cookie is received. You can choose to either accept or reject the cookie. You can also check which cookies are stored by your web browser and can remove those you do not want. If you choose to disable cookies related to our website on your browser, you may not have access to all of the content and facilities our website (or other websites) offer.

Storing and Securing Your Personal Information

Your personal information is held in a combination of hard copy documents and electronic files. Reasonable steps are taken to ensure the protection and security of your personal information from misuse, interference and loss. Some of the ways we do this are:

- requiring employees and contractors to enter into confidentiality agreements;
- secure hard copy document storage (i.e. storing hard copy documents in locked filing cabinets in our secure offices);
- providing a discreet environment for confidential discussions;
- access control for our buildings; and
- security measures for our website.

EAS will review and update our security measures from time to time. In addition, we will review the personal information and sensitive information held by us from time to time, ensuring that information which is no longer needed for a purpose for which it was initially collected is destroyed or de-identified. We also take reasonable steps to ensure your personal information, stored electronically, is protected from unauthorised access, modification or disclosure. For example, our website has electronic security systems in place, including the use of firewalls and data encryption. You may be able to access external websites by clicking on links we have provided on our website. Those other websites are not subject to our privacy standards, policies or procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures. If you suspect there has been a breach of our documentary or electronic security systems, please contact us.

Access To, Or Correcting, Your Personal Information

You are entitled to request access to your personal information held by EAS.

If you would like access to, or the correction of, your personal information held by us:

- please contact us at office@easternairservices.com.au;
- we will respond to your request within a reasonable time, unless it is not practicable or unreasonable to do so;
- we will need to verify your identity in order to process your request;
- we may recover from you, the reasonable costs of providing you with the requested personal information (we will not charge you for making a request or requesting to update your personal information);
- in the event access to the requested personal information is refused, we will provide you with reasons for the refusal and details about how you may complain about the refusal; and
- in the event we decline to correct your personal information, we will provide you with reasons for the refusal and details about how you may complain about the refusal. You may provide a statement about the requested correction(s), and we will ensure that the statement is apparent to any users of the relevant personal information.

Under the Act, EAS may refuse to grant access to personal information if:

- we believe that granting access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- granting access would have an unreasonable impact upon the privacy of other individuals;
- denial of access is required or authorised by law or by a Court or Tribunal order;
- giving access would be unlawful;

- the request for access is frivolous or vexatious;
- legal proceedings are underway or anticipated and the information would not be accessible by way of the discovery process in those proceedings;
- giving access would reveal our intentions in relation to negotiations between us and you in such a way as to prejudice those negotiations;
- giving access is likely to prejudice enforcement related activities conducted by, or on behalf of an enforcement body;
- giving access is likely to prejudice action being taken or to be taken with respect to suspected unlawful activity or serious misconduct relating to our functions or activities; or
- giving access would reveal information in connection with a commercially sensitive decision making process.

Should you wish to make a complaint, you can do so by following the complaint procedures in this Privacy Policy.

Complaint Process

If you wish to make a complaint about our treatment, handling, correction or otherwise about your personal information you can contact the office@easternairservices.com.au. EAS will acknowledge receipt of a complaint within two business days.

EAS will investigate the complaint and attempt to resolve it within twenty business days after the complaint was received. Where it is anticipated that this timeframe is not achievable, we will contact you to provide an estimate of how long it will take to investigate and respond to the complaint. If you are not satisfied with our response, you may make a complaint to the Office of the Australian Information Commissioner:

- GPO Box 5218
- Sydney NSW 1042
- Phone: 1300 363 992
- TTY: 133 677 then ask for 1300 363 992
- Email: enquiries@oaic.gov.au

Where your complaint relates to our provision of airline services and not the treatment, handling, use, correction or otherwise of your personal information, please contact EAS.

Changes and Updates to Our Privacy Policy

Our Privacy Policy may be reviewed and updated from time to time. Reviews are to examine the appropriateness of the policy taking into consideration corporate, system and compliance requirement changes since the last review was undertaken. The most up-to-date version of our Privacy Policy will be available on our website www.easternairservices.com.au Your continued use of our website or alternatively, your continued dealings with us, constitutes your acceptance of this Privacy Policy as it applies from time to time.

Credit Information and Credit Reporting Policy

EAS are bound by Part IIIA of the Act and the Credit Reporting Privacy Code (Code). In accordance with the requirements of the Act and the Code, we have a separate policy regarding credit information and credit reporting. The most up-to-date version of our Credit Information and Reporting Statement is available on request by contacting EAS.

How to Contact EAS

EAS can be contacted:

- By telephone: 1300 359 327
- By email: office@easternairservices.com.au
- In writing: EAS Group Safety Manager, PO BOX 1222, Port Macquarie , NSW , 2444 , Australia