



## PRIVACY POLICY

At Duty Nobly Done Battlefield Tours (ABN 26 786 438 446), we understand that you care how your personal information is handled and we appreciate your trust that we will do so carefully and sensibly and in compliance with the Australian Privacy Principles of the *Privacy Act 1988*.

This statement of our privacy policy has been prepared because we recognise that our clients may have concerns about their privacy and confidentiality whilst dealing with us.

### 1. Purpose of the Policy

This policy statement outlines how Duty Nobly Done Battlefield Tours collects personal or sensitive information in its dealings with clients and other members of the public, including users of our website, and how we manage that information.

### 2. Information We Collect

We will regularly collect personal information including your name, address, phone number, fax number or email address, and credit card details, as well as the details of your assets and financial affairs that you provide us in connection with our provision of services to you.

Other information that may be collected from time to time if reasonably necessary includes your health condition and medical history, passport number, concession card number, driver's license number and tax file number.

The personal information collected will be mainly held by us on electronic storage media, although paper records may also exist. Paper records will be held in secure premises, and electronic records will be accessible only by authorised personnel holding a valid password.

### 3. Reason for Collection

This information will routinely be collected in order to assist us in providing products or services or fulfilling enquiries or requests.

The information collected is to identify the individual, to assess the suitability of and to compose the products and services that Duty Nobly Done Battlefield Tours is to provide, and where requested to assess an application for credit and to monitor such credit facility provided and where necessary to assist in the recovery of any debt.

In connection with these purposes Duty Nobly Done Battlefield Tours may disclose personal information to trade insurers, other suppliers, credit reporting agencies, debt collecting agencies, cheque guarantee providers, other organisations involved in Duty Nobly Done Battlefield Tours' business practices, an individual's representative and as required by law.

If you provide us with personal information specifically for a particular purpose (a primary purpose) then you must expect that Duty Nobly Done Battlefield Tours may also use and disclose that information for any of the aforementioned other purposes (a secondary purpose). In addition to the aforementioned purposes, a permitted secondary purpose will be any other purpose that is related to the primary purpose which an ordinary person would reasonably expect such information to be used for.

We may also from time to time use that information for purposes of conducting direct marketing to promote our products and services, surveying interest in other products and services, sending invitations to educational or social functions or for purposes of disseminating information which we think may be of interest to our clients and contacts.

If you do not consent to Duty Nobly Done Battlefield Tours using and disclosing personal information in this manner then please contact us in the manner described *below*. However, in the absence of your consent, Duty Nobly Done Battlefield Tours will not be able to provide you with the full range of products and services.

#### 4. Use and Disclosure of Personal Information

Your personal information will only be used for these purposes and will not be shared, sold or given to any third parties, unless required or authorised under the exemptions set out in the *Privacy Act*.

#### 5. Consequences of Non-Disclosure of Personal Information

If you choose not to provide Duty Nobly Done Battlefield Tours with the personal information as requested we may not be able to provide you with the full range of our products and services.

#### 6. Quality of Personal Information

Duty Nobly Done Battlefield Tours' aim is to ensure that your personal information is relevant, accurate, complete and up-to-date. To assist us with this, please contact us if any of the personal information you have provided changes and we will use all reasonable efforts to update the data.

#### 7. Personal Information Security

Duty Nobly Done Battlefield Tours is committed to keeping secure the data you provide us and we will take all reasonable precautions to protect your personal information from interference, loss, misuse, modification or disclosure.

We generally do not contract out data storage or processing functions. If Duty Nobly Done Battlefield Tours does contract out storage or processing of data containing personal information, we will take reasonable steps to ensure the recipient of the information acknowledges the private nature of any personal information disclosed, and that the recipient undertakes to abide by the privacy obligations under the Australian Privacy Principles in respect of any personal information received, subject to any permitted exceptions to those obligations.

It is conceivable that personal information may be disclosed by Duty Nobly Done Battlefield Tours to a business or government agency located in a jurisdiction other than Australia (an overseas recipient) in limited circumstances. We will not disclose personal information to an overseas recipient unless it is necessary for the negotiation or performance of a contract between you and the overseas recipient (or its Australian principal) that we are arranging on your behalf (a booking), or for the negotiation or performance of a contract between us and the overseas recipient that is necessary to give effect to your booking or is otherwise in your interest.

We will endeavour where possible not to deal with overseas recipients unless they have undertaken to comply with Australian Privacy Principles (other than Australian Privacy Principle 1) or we believe they are subject to a law in their jurisdiction that overall is at least substantially similar to the way in which the Australian Privacy Principles protect personal information and enforcement mechanisms are available in the event of a breach of privacy. If these circumstances do not apply then we will not release your personal information unless you expressly consent.

In the course of providing services to customers who are travelling overseas, it is likely that Duty Nobly Done Battlefield Tours will disclose personal information to Australian based travel organisations such as tour companies ("Australian travel organisations") who will in turn disclose that information to an overseas recipient. You should be aware that Duty Nobly Done Battlefield Tours holds no responsibility for the treatment of your personal information by that overseas recipient, although the Australian travel organisation to which we provided it will also be bound by the Australian Privacy Principles.

Therefore, the Australian travel organisation will be responsible to ensure that the overseas recipient has undertaken to comply with Australian Privacy Principles (other than Australian Privacy Principle 1) or the Australian travel organisation believes the overseas recipient is subject to a law in its jurisdiction that overall is at least substantially similar to the way in which the Australian Privacy Principles protect personal information and enforcement mechanisms are available in the event of a breach of privacy.

Duty Nobly Done Battlefield Tours will retain the personal information for so long as is reasonably necessary for its purposes but we will destroy or permanently remove the identifying features of personal information if it is no longer needed.

## 8. Access to Personal Information

You can request us to provide access to the personal information that we hold about you.

You may request us to amend the details of the personal information we hold. We will amend the details on request provided we are satisfied that the amendment is valid. We may in some circumstances request you to provide documentary evidence or other corroboration of validity (e.g. provision of a marriage certificate or a registered deed poll to amend your name). If we do not consider it appropriate to make an amendment we will notify you within a reasonable time including written reasons for the refusal.

If we refuse to amend details of any personal information that we hold following a request from you, you may request that we include in our records a statement associated with the applicable information that will make apparent to users of the information that you contest its validity (“a qualifying statement”).

If you consider that Duty Nobly Done Battlefield Tours has wrongly failed to amend its records or not complied with the Australian Privacy Principles in its treatment of your personal information you may lodge a written complaint detailing the grounds of complaint. All complaints received will be considered and a written response, including a statement of any remedial action to be taken if appropriate, will be provided to you within a reasonable time.

To request access, request an amendment, request a qualifying statement or make a complaint please contact us using the details provided.

[info@dndbattletours.com.au](mailto:info@dndbattletours.com.au)

Personal information in any email we receive from you, including email addresses, will only be used for the purposes given and are subject to the conditions set out in this privacy statement. However, communications over the Internet are inherently insecure.

Sending personal information in an email remains entirely at your own risk and Duty Nobly Done Battlefield Tours will not be responsible for any unauthorised use of this information by third parties.

## 9. Visiting Our Website

We may collect information on website activity, such as the number of visitors, the number of pages viewed, navigation patterns, what systems users have and the date and time of visits. This information is collected for statistical purposes only and will not be used to identify you.

We may also utilise “cookies” which enable us to monitor website traffic patterns and to serve you more efficiently if you revisit the site. A “cookie” is a small software file that is placed on your computer and enables our website to recognise your computer upon a return visit. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. Please be aware that disabling cookies may impede your use of the website to some extent.

If you allow the cookie to apply then the data collected will enable better understanding of your pattern of use and areas of interest which facilitates the improvement of our website, both as to content and its ease of use. The location of your computer may also be identified which assists us to tailor products and services appropriate to users in particular locations.

We use two types of cookies, depending on whether you are a registered user or a casual visitor to our website. If you are a registered user with an allocated Agent ID then the cookie information will be linked to your user account, and you will thereby be personally identified. If you are a casual visitor (including registered users who choose not to login) then the operation of the cookie is “session based” and will expire 20 minutes after your browser ceases to be active, or upon the browser being closed. A session based cookie will not identify you personally, only the unique identification code of the computer you are using.

We may also use pixel tags which interact with a user's web browser to allow certain data about our IT systems' interaction with users to be collected, such as whether email we have sent has been opened and viewed. The purpose of collecting this information is to assess the general effectiveness of our email transmissions and other electronic communications.

Naturally, we will become aware of your identity if you choose to provide personal information in the course of using our website, or when communicating with us by email or other electronic media, irrespective of our use of cookies or pixel tags.

The Duty Nobly Done Battlefield Tours website may contain links to third-party websites. Please take note that Duty Nobly Done Battlefield Tours is in no way responsible for the content or the privacy practices on these sites.

## 10. Australia - Complaints Handling

If you have a complaint about how we collect, hold, use or disclose your personal information or a privacy related issue such as refusal to provide access or correction, please use our complaints process so that we can help. It is important to follow the complaint handling process in order to resolve your complaint effectively and efficiently.

If you are subject to the Australian privacy regime please note how we will deal with a complaint:

### Step 1. Let us know

If you would like to make a complaint, please let us know by contacting us. A response is usually provided to you within 5 business days by our privacy officer. You can contact us by using the relevant Complaints contact in the Duty Nobly Done Battlefield Tours Privacy Contact Information below.

### Step 2. Review by our Internal Privacy team

If you are not satisfied with the outcome of the business review you can request the complaint be referred to the Senior Management Team for review or you can contact them directly. Should additional information be required from you, we will contact you to discuss. The Senior Management Team will usually contact you with a decision within 25 business days of receiving your complaint. You can contact the Senior Management team by using the relevant contact in the Duty Nobly Done Battlefield Tours Privacy Contact Information below.

### Step 3. Seek review by an external service

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you may be able to access the services of an External Dispute Resolution Scheme such as the below.

Australia Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing

Office of the Australian

Information Commissioner

GPO Box 5218

Sydney NSW 2001

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

## 11. Contacting Us

If you have any questions about this privacy statement, the privacy practices of Duty Nobly Done Battlefield Tours or you wish to make a request or lodge a complaint, please do so in writing to:

Duty Nobly Done Battlefield Tours

Email [info@dndbattletoours.com.au](mailto:info@dndbattletoours.com.au)

Duty Nobly Done Battlefield Tours reserves the right to change this Privacy Policy at any time. It is advisable to review this privacy statement periodically for changes.

Further information on the *Privacy Act* and the National Privacy Principles can be found on the Australian Information Commissioner's website at: [www.privacy.gov.au](http://www.privacy.gov.au).

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