

PRIVACY POLICY

Circle Travel Agency, Inc. (“us”, “our” or “we”) respects your privacy and this policy sets out how we collect, use, store, disclose and otherwise treat your personal information. Your personal information is collected by us for the primary purpose of providing travel services to you.

In providing us with your personal information you are agreeing that this Privacy Policy will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as outlined in this Privacy Policy. If you do not agree to the privacy practices outlined in this Privacy Policy you must not provide us with your personal information. However, this may affect the services that we can provide to you.

1. Collection of your personal information

The personal information collected, held, used and disclosed by us is collected from you either directly, by our personal travel managers or from third parties.

We only collect personal information that is necessary to assist us in providing the services you request. The types of personal information that we collect from you depends on your individual circumstances and on the type of service that you request from us. For example, when you request us to make your travel arrangements, we (or our personal travel managers) collect personal information such as:

- (a) title (gender);
- (b) name;
- (c) date of birth;
- (d) address;
- (e) email address;
- (f) postcode;
- (g) nationality;
- (h) credit card or other payment details including billing address;
- (i) travel details;
- (j) passport number;
- (k) dietary requirements;
- (l) other information relevant to travel arrangements;
- (m) IP address of visitors to our website; and
- (n) using cookies to store a user’s name and password on their computer for future visits to our website.

Sensitive information is collected if it is relevant to the provision of travel related services, such as insurance cover. This could include, but is not limited to, health information, religious practices or details of a criminal record that may be relevant to your travel arrangements.

We (or our personal travel managers) may collect your personal information in a variety of ways, including the following methods:

- (a) information given directly by you when making a booking either with us directly or with one of our personal travel managers. This information will usually be provided in person during a meeting, online, by facsimile, by writing to us or by telephone;
- (b) information you provide on our website, such as to register online for special deals, competitions or to receive our newsletters;
- (c) from one of our affiliated companies;
- (d) from other travel agents or service providers;
- (e) from market research companies;
- (f) from third party service providers that collect personal information when providing you with a service and then provide that information to us, such as frequent flyer programs

2. Use of your personal information

We collect your personal information for the primary purpose of providing travel related services, including:

- (a) to make bookings with travel service providers, such as airlines, hotels and tours, on your behalf;
- (b) to fulfil administrative functions associated with your purchase order, such as billing;
- (c) to correspond with you in relation to the travel services you have requested;
- (d) to provide you with promotional and marketing materials that may be of interest to you;
- (e) using the IP address of visitors to our website to help diagnose problems with our server, to administer our website and for statistical purposes.

We will not sell our client database to third parties and will only use your personal information for the purpose for which it was provided or a related secondary purpose, unless you agree otherwise or the use and disclosure is permitted under the Privacy Act.

3. Disclosure of personal information:

Your personal information may be disclosed to third parties in the following circumstances:

- (a) as required or authorized by law, such as where unlawful activity has been engaged in, or is suspected of being engaged in, as required by law enforcement officials or agencies; and
- (b) to travel service providers, such as travel wholesalers, tour operators, airlines, hotels and other service providers for the purpose of providing you with the travel services that you have requested.

When we book travel arrangements for you and collect your personal information we act as agent on behalf of travel service providers, such as airlines, tour companies, travel insurance providers and hotels who are responsible for providing your services.

The personal information that we need to disclose to third party travel suppliers to provide you with the travel services you request may include sensitive information.

Some of the travel service providers that we disclose your personal information to may be located outside the United States of America. The overseas travel service providers may not have privacy standards equivalent to the standards imposed in the United States of America. We do not exercise any control over the privacy practices of overseas recipients. If you do not consent to this you should not disclose your personal information to us.

4. Security of your personal information

We take reasonable steps to:

- (a) ensure that personal information that we collect, use and disclose is accurate, complete, up-to-date and relevant, having regard to the purpose of the use or disclosure and stored in a secure environment;
- (b) implement physical, electronic and organization steps to protect your personal information that we hold from misuse, interference and loss and from unauthorized access, modification or disclosure;
- (c) regularly review and update our security measures to maintain the security, integrity and privacy of personal information that we collect;
- (d) destroy or de-identify personal information when it is no longer required.

Security measures that we have in place to protect your personal information include the following:

- (a) employing industry standard techniques such as firewalls, virus scanning tools and encryption;
- (b) requiring employees and personal travel managers to use logins and passwords for access to all systems;
- (c) requiring all staff and contractors to maintain the confidentiality of customer information; and
- (d) using secure networks when transmitting electronic data.

To the extent permitted by law, we are not liable for any unauthorized access to your personal information or for any other security breach.

5. Unsubscribing

You can unsubscribe from receiving communications from us at any time. If you do not wish to receive any further marketing material from us click on the unsubscribe link.

6. Access to, and correction of, your personal information

You are able to access and correct your personal information held by any of our personal travel managers by contacting that personal travel manager directly.

You may request access to, or correction of, any of your personal information that we hold by contacting us directly using the details set out below. We will respond to your request within a reasonable period after it is made and may recover from you our reasonable cost of providing you with access.

7. Third party websites

Our website contains links to other websites that are not controlled, operated or maintained by us. We are not responsible for the privacy practices of those websites. Before providing your personal information to such websites, you should read, and ensure that you understand, their privacy policies.

8. Updates to our privacy policy

This privacy policy is subject to change without prior or separate notification. Any changes will be posted to our website.

9. Complaints

If you have a complaint about the way we have dealt with your personal information, or if there has been a breach of this Privacy Policy, please contact us directly using the details set out below. We will respond to your complaint within a reasonable time.

10. Circle Travel Agency, Inc contact details:

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