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## Privacy Policy

*Effective from 12/07/2022*

In this Privacy Policy, 'France Travel Solutions', 'us' 'we' or 'our' means **France Travel Solutions** (ABN 37 936 297 869) and any agents who act on our behalf. We are committed to respecting your privacy.

Our Privacy Policy sets out how France Travel Solutions collects, uses, stores and discloses your personal information. By providing personal information to us, you consent to our collection, use, storage and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

France Travel Solutions is committed to complying with its obligations under the *Privacy Act 1988* (Cth) and the *Australian Privacy Principles* (collectively, "**Privacy Law**"), in respect of the collection, storage, use and disclosure of personal information.

This Privacy Policy also incorporates our Terms and Conditions. If you do not accept this Privacy Policy and the Terms and Conditions, you must not use our services.

Although France Travel Solutions will comply with this Privacy Policy in respect of information provided to us by persons under the age of 18 years, persons under the age of 18 years must obtain the consent of a parent or guardian prior to accessing and/or using our website and our services, and the parent or guardian will be responsible for appropriately supervising that person's access to and/or use of our website and services.

**Personal information** includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card or bank information.

Occasionally, France Travel Solutions may ask you for personal information about other people. If you choose to disclose this information to us, you should only do so if you have their consent to do so. You should take reasonable steps to inform them of the details in this Privacy Policy.

### 1. What personal information do we collect?

France Travel Solutions may collect the following types of personal information:

- name;
- job title;
- mailing or street address;
- email address;
- telephone number and other contact details;

- financial, bank and/or credit card information;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and/or services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and/or services and respond to your enquiries;
- preferences and interests;
- details of enquiries or complaints you make;
- any additional information relating to you that you provide to us directly through our website or indirectly through your use of our website or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys; or
- any other personal information that may be required in order to facilitate your dealings with us.

France Travel Solutions may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:

- complete registration or enquiry forms, order any products or services from us publish reviews, or send emails to us;
- communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites;
- interact with our sites, content and advertising.

France Travel Solutions will generally collect personal information directly from you. We may also collect personal information from third parties (including third party data analytic service providers), third-party social-networking sites (including but not limited to Facebook, Twitter, or Google) and publicly available sources of information. We may use personal information supplied by you or a third party to source additional personal information from publicly available sources of information.

Where lawful and practical, you have the right to remain anonymous or to make use of a pseudonym, however if you choose to remain anonymous or to use a pseudonym, we and our third party contractors and merchants, as the case may be, may not be able to provide you with access to some or all of our products and/or services (including information products).

Please do not submit your personal information to us if you do not wish for us to collect and or use it.

## **2. Sensitive information**

Some personal information (for example, race, ethnicity, and health information) is sensitive and requires a higher level of protection under the Privacy Law. We will not generally collect any sensitive information from you which we consider is unnecessary to provide our products or services. We will only collect such sensitive information when we have your express consent for us to do so and the collection is reasonably necessary for us to provide our products or services, or where the information is required or authorised by law or necessary for the establishment, exercise or defence of a legal claim.

### **3. Why do we collect, use and disclose personal information?**

France Travel Solutions may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our website in order to provide you with, and to facilitate your use of, our products and/or services including processing your bookings through our website;
- to operate, protect, improve and optimise our website, products, services, business and our users' experience, such as to perform analytics, conduct market research and for advertising and marketing;
- to inform you about the latest changes to our website, products, services or promotional offers that you may be interested in;
- to send you administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you booking confirmation details or to contact you if there is a problem with a transaction, enquiry or booking;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to administer our newsletter and any rewards, surveys or other promotional activities or events sponsored or managed by us or our business partners;
- to personalise your use of our website;
- to provide you with personalised communications including personalised recommendations and submission of feedback;
- to enter into contracts with suppliers to conduct our business;
- for internal administrative purposes such as accounting, billing, customer service and product and service reviews;
- to reconcile payments due to use from suppliers in relation to goods provided to you by those suppliers;
- to carry out credit checks and access to credit report information;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties;
- to carry out technical and statistical analysis to measure the performance of our products, services and website.

France Travel Solutions may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner as if we had solicited the information, then

we will treat it in the same way as solicited personal information and in accordance with the Privacy Law. Otherwise, if we determine that such information could not have been collected in the same manner as solicited personal information, and that information is not contained in a Commonwealth record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

#### **4. Do we use your personal information for direct marketing?**

France Travel Solutions, business partners, agents, suppliers or contractors may send you direct marketing communications and information about our products and services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (for example, via an unsubscribe link).

#### **5. To whom do we disclose your personal information?**

To the extent permitted by law, France Travel Solutions may disclose personal information for the purposes described in this Privacy Policy to:

- our employees, agents and contractors;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- payment systems operators (for example, merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

France Travel Solutions reserve the right to disclose your personal information without your consent if the disclosure is:

- to comply with applicable laws and government or regulatory bodies' lawful requests for information;
- required in order to investigate an unlawful activity;
- required by an enforcement body to investigate activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

France Travel Solutions may transfer, sell or assign any of the information described in this Privacy Policy to third parties as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganisation of our company.

Subject to obtaining your consent, we may also supply personal information about you to third parties other than as set out above.

## **6. Disclosure of personal information outside Australia**

France Travel Solutions may disclose personal information outside of Australia to third party suppliers, cloud providers and payment processors located outside of Australia, including, without limitation, in France.

When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with Privacy Law. France Travel Solutions will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

## **7. Using our website and cookies**

France Travel Solutions may collect personal information about you when you use and access our website and social media accounts.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

France Travel Solutions may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

France Travel Solutions may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

## **8. Keeping your personal information secure**

France Travel Solutions may hold your personal information in either electronic or hard copy form. France Travel Solutions takes reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. We use reasonable efforts to employ best practice to protect all data held or protected by us, for example, we conduct regular audits to assess our security measures. However, as our website and mobile application are linked to the internet, and the internet is vulnerable to penetration by nefarious actions, we cannot guarantee the security of the personal information you provide us online.

In the unlikely event that there is an unauthorised use or disclosure of your personal information, we will notify you of the data breach and will undertake an investigation into how the data breach occurred and its likely severity. As part of this, we will endeavour to work with you and the Office of the Australian Information Commissioner to limit the impact, and any reoccurrence, of the breach.

## **9. Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are

not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## **10. Accessing or correcting your personal information**

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

## **11. Making a complaint**

If you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint as promptly as possible.

If you believe we have not adequately dealt with your complaint, you may complain to the Office of the Australian Information Commissioner about the way we handled your personal information. The Commissioner can be contacted at:

Address: GPO Box 5218 Sydney NSW 2001  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **12. Changes to this Privacy Policy**

France Travel Solutions may change our Privacy Policy from time to time by publishing changes to it on our website with an updated effective date. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy. If we make significant changes to our Privacy Policy, we may also notify you by other means such as sending an email or posting a notice on our home page.

## **13. Contact Us**

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

France Travel Solutions  
53 Jack Street  
Gordon Park QLD 4031  
<https://www.francetravelsolutions.com/contact-us>  
[\[maud@francetravelsolutions.com\]](mailto:maud@francetravelsolutions.com)

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