



## PRIVACY POLICY - AUSTRALIA

### 1. OUR POLICY

Cruisemaster Australia Pty Ltd, ABN 44 010 033 762 (Cruisemaster) will take all reasonable steps to ensure processes and procedures are implemented to safeguard personal information. Whilst not claiming to be a statement of compliance, this Privacy Policy outlines the use, collection, and storage of personal information at Cruisemaster in accordance with the Australian Privacy Principles, contained within the *Privacy Act 1988* (Cth).

### 2. SCOPE

This Privacy Policy applies to all personal information collected by Cruisemaster in the course of providing services to our current and potential clients, regardless of the source of that personal information. This Privacy Policy is available for public viewing at <https://cruisemaster.com.au/privacy-policy/>

This Privacy Policy should be read in conjunction with Cruisemaster's Terms and Conditions when using a Cruisemaster website and when interacting with Cruisemaster in person. These terms and conditions are available at: <https://cruisemaster.com.au/terms>

#### 2.1 Terms and Definitions

The key terms used in this Privacy Policy are defined below, unless the context indicates otherwise:

- a. <http://www.cruisemaster.com.au/> and/or
- b. <http://www.cruisemasterpc.com.au/>

**Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

**Privacy Officer** means a person appointed by Cruisemaster's General Manager to act as the conduit between clients and Cruisemaster's management and oversee any privacy related enquiries.

**Site** means Cruisemaster's current public facing websites:

- a. whether the information or opinion is recorded in a material form or not.
- b. whether the information or opinion is true or not; and

**Privacy Policy** means this privacy policy and any amendments made to it.

### 3. REFERENCES

- AS/NZS ISO 45001:2018—Occupational health and safety management systems - Requirements with guidance for use, clause 6.1.3
- AS/NZS ISO 9001:2016—Quality management systems – Requirements, clause 8.2.1
- *Privacy Act 1988* (Cth)
- *Work Health and Safety Act 2011* (Qld)

#### 4. RESPONSIBILITIES

General Manager	<ul style="list-style-type: none"> <li>The General manager has the ultimate responsibility for this policy and must ensure, so far as is reasonably practicable, that the requirements of this policy are upheld, and that adequate resourcing is made available to address the requirements of this policy.</li> </ul>
Privacy Officer	<ul style="list-style-type: none"> <li>The Privacy Officer is the conduit between Cruisemaster's clients, customers, and management. The Privacy Officer is Cruisemaster's key contact for members of the public and clients with privacy concerns. The Privacy Officer function is an additional task appointed to the customer service role.</li> </ul>
HSE Manager & Quality Manager	<ul style="list-style-type: none"> <li>The HSE Manager and Quality Manager are responsible for reviewing this policy and associated procedures and processes through internal audit and management review.</li> </ul>
All managers and employees	<ul style="list-style-type: none"> <li>All managers and employees are responsible for ensuring all clientele personal information is recorded, stored, and only used in accordance with this policy.</li> </ul>

#### 5. PRIVACY PROCEDURES

##### 5.1 Personal Information

###### 5.1.1 Collection of Personal Information

Cruisemaster collects personal information about clients and potential clients in order to provide clients the services they have requested. If this personal information is not provided, Cruisemaster may not be able to provide its clients with their requested services.

Cruisemaster endeavours to collect personal information from clients directly. Information Cruisemaster obtains from third parties or publicly available information is limited to circumstances where the client has consented whether that be expressly or impliedly.

###### 5.1.2 Types of Personal Information Collected

The personal information Cruisemaster collects includes a person's first and last names, email address, contact phone numbers, business name, and any other personal information supplied during the course of any interaction or transaction.

###### 5.1.3 Collection and Use

Cruisemaster collects, holds, uses, and discloses personal information to deliver and improve the services provided to clients. Generally, clients are only obliged to provide Cruisemaster with the information necessary to provide such services; however, if a client does not provide Cruisemaster with certain types of personal information, the requested services may not be able to be provided.

###### 5.1.4 Collection of Information from the Internet

Cruisemaster collects and logs information from its websites and from Cruisemaster's interactions with clients online. This information is all held in digital format only.

## 5.2 Access, Corrections, and Complaints

### 5.2.1 Accessing Personal Information

If any person would like to access or correct personal information that Cruisemaster holds about them, they should contact the Privacy Officer in the first instance:

In person	By mail	By email	By phone
352b Bilsen Road Geebung QLD 4034	PO Box 14 Virginia BC QLD 4014	<a href="mailto:privacy@cruisemaster.com.au">privacy@cruisemaster.com.au</a>	07 3624 3800

The client will need to satisfactorily identify themselves before Cruisemaster will provide any personal information about an individual which Cruisemaster may or may not have in its possession. Client identification may be verified by physically sighting personal identity documents, or the client being able to verify certain aspects of their interactions and transactions with Cruisemaster, or a combination of both.

### 5.2.2 Complaints Procedure

Cruisemaster operates a service orientated business via a permanent sales and production facility and web sites. Should a client have a complaint about the manner in which Cruisemaster collects or uses personal information it holds, then the client should contact Cruisemaster's Privacy Officer in first instance.

If, after an investigation, the client is not satisfied with the outcome, the client can contact the 'Australian Information Privacy Commissioner' for further advice at:

Online	By mail	By email	By phone
<a href="https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC">https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC</a>	GPO Box 5218 Sydney NSW 2001	<a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>	1300 363 992

### 5.2.3 Transfer of Personal Information Outside Australia

Cruisemaster will take all reasonable steps to ensure that entities which provide Cruisemaster with necessary services for website hosting and database administration, act in accordance with the Australian Privacy Principles. Cruisemaster shall only engage recognised service providers who use enterprise level software with up-to-date SSL Encryption.

### 5.2.4 Anonymity and use of Pseudonyms

Where practical and reasonable to do so, Cruisemaster may provide clients with the opportunity to use pseudonyms in relation to information clients provide to Cruisemaster. Where appropriate, Cruisemaster may also provide clients with the option to interact anonymously.

### 5.2.5 Unsolicited Personal Information

Cruisemaster will only collect personal information about individuals by lawful and fair means. Should any unsolicited personal information be received by Cruisemaster, this information will be immediately destroyed, ensuring all information is de-identified or no longer identifiable.

### 5.2.6 Notice of Collection of Personal Information

Wherever possible, Cruisemaster will notify clients in advance when personal information about the clients by Cruisemaster, the use of which is subject to this Privacy Policy.

## 5.3 Use of Personal Information in Direct Marketing

### 5.3.1 Direct Marketing

Cruisemaster may use personal information for the purposes of promoting services to clients where they would reasonably expect it to be used for this purpose. If Cruisemaster uses a client's personal information to provide them with promotional and marketing information, Cruisemaster will provide the client with an option to opt-out of this service.

### 5.3.2 Opting Out

Clients may unsubscribe to Cruisemaster's marketing material by clicking on the functional unsubscribe facility contained in an email or alternatively, the client may contact Cruisemaster's Privacy Officer by using the contact details listed at paragraph 5.2.2.

### 5.3.3 Use of Cookies

Cruisemaster may collect personal information that is reasonably necessary for the performance of operations and activities including marketing and sales. Cruisemaster automatically receives and records information on its server logs from the client's browser, including their IP address, operating system, top level domain, date and time, pages accessed, documents downloaded, previous website visited, type of browser used and other cookie information.

This enables Cruisemaster to tell when clients use the website and also to help customise the client's experience within the website. No personal information about a client is linked to the cookie nor is there any data matching between cookie information and client's internet activity.

## 5.4 Integrity of Personal Information

### 5.4.1 Security Measures taken for Personal Information

Cruisemaster will take all reasonable steps to protect the personal information from misuse, loss, and from unauthorised access. Further, Cruisemaster will take all reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purpose it was collected.

### 5.4.2 Accuracy

Cruisemaster will take reasonable steps to ensure that the personal information Cruisemaster collects, uses, or discloses is accurate, complete, and up to date.

### 5.4.3 Security

Cruisemaster will take reasonable steps to safeguard the disclosure of personal information from third parties, contractors, and staff. Cruisemaster has up to date procedures and policies relating to information technology as it relates to staff and strive for best practice in this area. This includes training for staff in relation to privacy, access control of sensitive data, clear communication of policies, procedures, and the importance of respecting privacy guidelines.

## 6. REPORTING

Where privacy issues are recorded by the Privacy Officer, these must be reported through management reporting to Cruisemaster's executive and, if required, to Board level. Internal privacy issues may be recorded as non-conformances and reported through quality systems reporting.

## 7. MONITORING AND REVIEW

This policy may be amended from time-to-time and is monitored through internal audit and scheduled reviews as required by the document review schedule, or may also be amended:

- when a risk management process requires a review as a corrective action from an incident or unplanned event, or
- when changes in legislation require a review to comply, or
- when changes in compliance standards or best practice evidence suggests a review, or
- when changed company operations mandate a review.

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