

## **1. Information about us**

Alan Rogers (Australia) Pty Limited (**Alan Rogers**), trading as:

Alan Rogers Travel  
Worldwide Caravan & Motorhome Holidays

Is the operator of the following websites (our websites):

[www.alanrogerstravel.com.au](http://www.alanrogerstravel.com.au)  
[www.alanrogerstravel.co.nz](http://www.alanrogerstravel.co.nz)

We are a company limited by share capital registered in Queensland, Australia ABN 87 639 697 322. Our registered address is: Level 6, 9 Beach Road, Surfers Paradise QLD 4217, Australia.

Alan Rogers (Australia) Pty Ltd is a subsidiary of The Caravan Club Ltd whose registered company address is: East Grinstead House, East Grinstead, West Sussex RH19 1UA United Kingdom.

## **2. Contact us**

If you would like any information about Alan Rogers and its activities, you can contact us by telephone on +61 7 2103 2130 or email [enquiries@alanrogers.com](mailto:enquiries@alanrogers.com). You can also write to us at Alan Rogers Travel, PO Box 588, Surfers Paradise QLD 4217, Australia.

If you have any queries relating to this Privacy Policy or our Use of Cookies policy, contact the Data Protection Officer by letter at the address above or email [DPO@alanrogers.com](mailto:DPO@alanrogers.com). A comprehensive list of contact telephone numbers and email addresses can be found on our website on our Contact us page.

## **3. Privacy Policy**

### **3.1. Our policy**

Alan Rogers (We) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our policy and practices regarding your personal data and how we will treat it. By visiting our websites, you are accepting and agreeing to the practices described in this policy.

For the purpose of compliance with Australian Privacy Law, our Data Protection Officer is our nominated person for data protection.

### **3.2. How do we collect information?**

Your personal data, that is any information which identifies you, or which can be identified as relating to you personally, for example, and not limited to: name, address, phone number, email address, will be collected and used by us. We obtain personal information from you when you enquire about our activities, register to receive a newsletter, make a holiday booking, send, or receive email, order materials such as travel brochures, ask a question or otherwise provide us with personal information. We may also receive information about you from third parties, for example, our service providers or from a friend who wants to tell you about our services.

We collect personal data in connection with specific activities such as: placing an order, booking holidays, and conducting research.

Examples of ways that you may share your personal data with us are by:

- completing electronic and paper forms
- registering to receive a newsletter
- subscribing to take part in research on our website or other social media functions on our website
- entering a competition, promotion, or survey
- corresponding with us by phone, email, social media, or letter
- buying products or services from us, e.g. booking a holiday

Alan Rogers will inform you at the point of collection what the purpose of the data processing is and provide you with the relevant information to access this Privacy Policy.

Children aged under 18 may be included on family holiday bookings by the lead passenger and we collect names and dates of birth for certain travel bookings. We do not target or include children in our marketing communications.

### **3.3. What information do we collect?**

The personal information we collect will depend on the nature of the data processing requirement. For example, it might include name, date of birth, email address, postal address, telephone number and bank account details, details of services we provide to you such as holiday bookings, information about your interests, and material that you submit to us for publication. Although we may take credit/debit card information to complete a transaction, we do not store this information.

Certain personal information is categorised by Australian data protection law as 'sensitive data'. In some situations, we process sensitive data about you, for example information about your health or dietary requirements.

We also gather general information about the use of our websites, such as which website pages users' visit most often and which services, events or facilities are of most interest. We may also track the pages users visit when they click on links in emails and we may use this information to personalise the way our websites are presented when users visit them, to make improvements to our websites and to ensure we provide the best service for users. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our websites. For more information on this, please see our Use of Cookies policy.

### **3.4. How do we use this information?**

Depending on your relationship with us, we will use your personal information for the following purposes:

- to provide you with the services, products, or information you have requested
- to provide information to you about us and the services provided by us and third parties
- to enable you to transact within certain areas of our websites and perform activities such as making a holiday booking or completing enquiry forms
- for general administration purposes, such as handling your enquiries and managing purchases of products and services
- to carry out research into the market for our goods and services
- to guide and support the general objectives of Alan Rogers
- statutory and regulatory compliance

As part of this, we may analyse the personal information we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information.

We may need to share your information with our service providers, associated organisations and agents for the purposes described above but we never sell your information to other organisations.

### **3.5. Cookies**

Our websites use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and allows us to improve our services. For detailed information on the cookies we use and the purposes for which we use them see our Use of Cookies policy.

### **3.6. Processing your personal data for analytics**

We know it is important to our website visitors to provide the best, tailored service possible. To help us do this, we use automated profiling and targeting to understand our users' requirements and make sure that:

- our communications (e.g. emails/brochures) and services (e.g. our website) are relevant, personalised and interesting to you, and
- our services meet the needs of our customers

To do this we will analyse how you interact with us on our website through use of data from holiday bookings and use both geographic and demographic information to let you know what's happening in your local area, nationwide and overseas and better understand your interests. We use specific tools, such as Google Analytics, to look at how you interact with us online.

Much of the information we collect is aggregated, however we may also collect some personal data for the use of personalising your experience, optimising our marketing campaigns, and to ensure the website site is functioning as intended.

### **3.7. How we use personal data to conduct research**

We occasionally carry out research to generate feedback on your experiences with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you. If you choose to take part in research, we will tell you when you start what data we will collect, why and how we will use it. All the research we conduct is optional and you can choose not to take part. We may share your personal data, e.g. contact information, to a third party data processor who will carry out research on our behalf, but only for the purpose explained here.

### **3.8. How do we protect your personal information?**

All pages within our website are protected by encryption and we process payments offline via a secure third-party payments service when you book a holiday or via PayPal when you make an online purchase. We take appropriate measures to safeguard personal information that is disclosed to us and keep it secure, accurate and up to date. We utilise established market leading services for many of our processing activities which are compliant with stringent privacy and security standards based on industry best practices.

### **3.9. How do we store your information, and do we send it outside of Australia?**

Our operations are based in Australia and our parent company is based in the United Kingdom. We store most of our data on secure cloud-based services. Some organisations which provide services to us may transfer data outside of Australia and/or the UK but we will only allow this if your data is adequately protected. To protect your data when it is transferred outside of these regions, we will either:

- put in place contract clauses approved by The Privacy Act or the relevant data protection regulator to protect your data.
- ensure that the country that the data is transferred to has adequate data protection regulations.
- ensure the one of the other safeguards set out in the relevant data protection laws is in place.

Sometimes it may be necessary for us to transfer data without us being able to put these safeguards in place, but we will only do this where the law permits, for instance if the transfer is necessary to perform a contract with you

### **3.10. Will we disclose the information we collect to third parties?**

As indicated above, we may pass your information to our service providers, agents and associated organisations for the purposes explained above. We share information with other data controllers and instructed data processors. Categories of recipients normally include:

- accommodation providers (hotels, guest houses etc.)
- overseas travel, rail, airline, and ferry companies.
- local agencies (bike hire companies, local tour operators)
- social media hosting services \*
- communication, distribution, and marketing companies \*
- third party retail suppliers
- financial transaction providers
- infrastructure service providers \*
- cloud service providers \*
- data storage, redaction, and destruction partners \*
- sub-contractors we appoint to provide services to you, for example luggage transfer services

We may also need to disclose your information if required by law, for example to government bodies and law enforcement agencies, or if we have your permission to do so. We will not sell any personal data or your web browsing activity to a third party.

\* Details of the third parties we work with for this type of data can be found in section 4.0

### **3.11. Links to other websites**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This Privacy Policy applies solely to the personal data collected by Alan Rogers.

### **3.12. What is the lawful basis for processing personal data at Alan Rogers?**

Collecting, processing and using personal data is permitted only under a lawful basis. The lawful basis that Alan Rogers operates under are listed below, along with the data processing activities that fall under them.

#### **(a) Contract with the data subject**

When you become a customer and provide us with your personal data, certain processing activities are considered necessary for the performance of the contract between you and Alan Rogers. This includes activities such as booking a holiday.

When you buy goods or services from us, we will process your personal data where this is necessary for us to provide you with those goods or services, including by sharing your data with third parties involved in providing the goods or services to you.

#### **(b) Legitimate interests of the data controller**

We will contact you with offers and services which we feel are relevant. This includes informing you of products and services provided by Alan Rogers and our trusted business partners, such as overseas travel offers. The lawful basis with which we use your personal data in this way is legitimate interests. This is because on balance, and taking account of your own interests, we have determined that the data processing is necessary for the legitimate business interests of Alan Rogers and to provide you with appropriate offers and services. You can object to being contacted for marketing purposes, please refer to section 3.14 for more information about this.

We also process your data where this is necessary for our administration of our business and to manage our relationship and correspondence with you, on the basis that we have a legitimate interest in doing this.

#### **(c) Legal obligations**

There are circumstances when we are required to process personal data in order to meet our legal obligations. Processing data under this basis can relate to financial data and ATO reporting requirements. When processing on the basis of legal obligations, you have no right to erasure or right to object.

#### **(d) Consent**

Where Alan Rogers relies on the lawful basis of consent to process personal data, it must be freely given, specific, informed, and must be an unambiguous indication of agreement. For example, we may require your consent to market products and services to you if you have not previously granted us consent. If you have provided consent, you have the right to withdraw it at any time. We would require your consent to process sensitive data unless processing data under the lawful basis of protecting vital interests or it is necessary for the performance of a contract.

#### **(e) Interests of the data subject**

Dependent upon which the products/services you have purchased from us, we may need to inform a third party of your situation, for example if you become ill whilst abroad. In these circumstances we would share this information with emergency services, and we would consider this type of processing as being necessary to protect your and other relevant individuals' vital interests.

### **3.13. What is the lawful basis for processing sensitive data at Alan Rogers?**

When we process sensitive data, we rely on one of the lawful bases outlined above as well as one of the following legal bases, which apply to sensitive data:

(a) Your explicit consent

In some circumstances, we provide you with the opportunity to voluntarily inform us of your sensitive data, e.g. whether or not you have a disability, so that we can help you with the allocation of appropriate accommodation. In these circumstances, if you choose to provide the information we rely on your explicit consent as our basis for processing.

Please note that if we need your consent to process sensitive data to provide a service and you decide not to give consent or you later withdraw consent, we will not be able to provide the service.

(b) Where processing is necessary for establishing, exercising, or defending legal claims

If it is necessary for us to process your sensitive data to establish, exercise, or defend a legal claim. This could happen, for instance, if there is a legal claim relating to a holiday booking you hold with us.

### **3.14. What are my data subject rights?**

Under Australian Privacy Law, a data subject is considered to be 'identified individual, or an individual who is reasonably identifiable'. Data subjects have certain rights and by exercising these rights, you can make requests regarding your personal data to Alan Rogers. A summary of these rights is explained below.

The Supervisory Authority that regulates and enforces data protection law in Australia is Office of the Australian Information Commissioner (OAIC) and additional information and guidance about these data subject rights can be found on their website as follows: [www.oaic.gov.au](http://www.oaic.gov.au)

1) Right to be informed

At the point of collecting personal data from you, Alan Rogers must provide you with information such as the purpose and rationale for the processing of that data.

2) Right to access

This right provides you with the ability to access to your personal data that is being processed by Alan Rogers. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your requested personal data. The information will be provided free of charge unless the request is manifestly unfounded or excessive; in those cases, the request may be refused, or a reasonable fee charged.

3) Right to rectification

This right provides you with the ability to ask for modifications and rectification to your personal data in the event you believe that your personal data is not up to date or accurate.

4) Right to erasure

There is no specific 'right to be forgotten' under Australian Law, however, you do have the right to access and to correction. Alan Rogers are obliged to delete or de-identify personal information once

it has been used for the notified purpose(s) of collection and is no longer required by law to be kept in an identifiable form. Further information can be found in section 3.16 of this document.

We may refuse to erase data if there is legal reason why the personal data must be retained, the grounds are not valid or if the data is required for use in the defence of a legal claim.

#### 5) Right to object/opt-out

You have the right to restrict the processing of your personal data where you have a particular reason for wanting the restriction. This may be because you have concerns with the personal data Alan Rogers holds about you or how we have processed your data. In most cases we will not be required to restrict your personal data indefinitely but will need to have the restriction in place for a certain period of time.

You have the right to object to Alan Rogers processing your personal data, including marketing activities and profiling, on grounds relating to your particular situation. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise, or defence of legal claims.

#### 6) Right to data portability

This right provides you with the ability to ask for a copy of or a transfer of your personal data, in a certain format. You may ask for your personal data to be provided back to you or transferred to another data controller. When doing so, the personal data must be provided or transferred in a structured, commonly used and machine-readable format.

#### 7) Right to object to automated processing

This right provides you with the ability to object to a decision based solely on automated processing, including profiling. Under this right, you may ask for your processing to be reviewed manually and with human intervention.

### **3.15. Exercising your data subject rights**

To make a request, we will require the following information.

- Evidence that you are the Data Subject (a document to verify your name. Examples of appropriate documents are: driving licence, passport, birth/adoption certificate or marriage certificate)
- The request type:
  - o Right of access
  - o Right to rectification
  - o Right to object/opt-out
  - o Right to data portability
- Title, first name & last name
- Email address
- Contact phone number
- Full address (including postcode)
- Request details

Please submit the relevant information to the Data Protection Office (DPO@alanrogers.com) for review. We may request further information from you to help us verify your identity. We will need all the information asked for above in order to process your request.



Once we have all the information necessary to respond to your request and have confirmed your identity, we will provide the information to you without undue delay and in any event within one calendar month. Note that this timeframe may be extended by two further months if your request is particularly complex or there is a large volume of requests

### **3.16. How long does Alan Rogers keep personal data for?**

We retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each data type, taking into account the reasons that the personal data was obtained, but if relevant, the length of retention is determined in a manner consistent with legal and regulatory obligations.

We have prepared a data retention policy that sets out detailed retention period for the different kinds of data we might hold about you. To request a copy of that policy please contact our Data Protection Officer using the contact details at the start of this policy.

### **3.17. Managing your preferences**

You have a choice about whether you want to receive information about our services. We will not use your personal information for marketing purposes or share your information with any third party if you have indicated that you do not wish to be contacted in this manner.

You can change your marketing preferences by:

- Clicking on the 'unsubscribe' link at the bottom of every marketing email we send you.
- Returning any postal communications to us, marked 'return to sender, please remove'
- Speaking to us on +61 7 2103 2130 and let us know what marketing materials you no longer wish to receive.
- Contacting our Data Protection Officer using the contact details at the start of this policy.

### **3.18. Payment card security**

Alan Rogers is compliant with the Payment Card Industry Data Security Standard (PCI DSS). This is the international standard for secure credit and debit card payment processes and means that when you pay for goods or services from Alan Rogers using a debit or credit card, the relevant technical and operational security requirements are in place to protect the account data.

### **3.19. Making a complaint**

If you think your data has been misused or that we haven't kept it secure please contact us and we will investigate any concerns you may have. If you are unhappy with our response or if you need any advice, you should contact the Office of the Australian Information Commissioner (OIAC). The telephone number for the OAIC helpline is 1300 363 992 or + 61 2 9284 9749 if calling from outside Australia. You can also visit their website for information at: [www.oaic.gov.au](http://www.oaic.gov.au)

### **3.20. Tell us about changes to your information**

If your personal details change, please help us keep your information up to date by notifying us at: Alan Rogers (Australia) Pty Ltd, PO Box 588, Surfers Paradise QLD 4217, Australia or by emailing [enquiries@alanrogers.com](mailto:enquiries@alanrogers.com)



### 3.21. Changes to this Privacy Policy

We will amend this Privacy Policy from time to time to ensure it remains up to date and reflects how and why we use your personal data as well as any new legal requirements. Please visit our website to keep up to date with any changes as the current version of this policy will always be posted on our website.

Version No.	Description of change	Date published
1.0	Original publication	22 April 2021

### 3.22. Monitoring of telephone calls

Your telephone calls to us may be recorded and monitored for quality control and regulatory purposes.

### 3.23. Last update

This Privacy Policy was created on 22 April 2021.

## 4. Data Processors

- Dotdigital - <https://dotdigital.com/terms/privacy-policy/>
- Facebook - <https://www.facebook.com/policy.php>
- Google - <https://policies.google.com/privacy>
- Issuu - <https://issuu.com/legal/privacy>
- Sota - <https://sota.co.uk/privacy-statement>
- Twitter - <https://twitter.com/en/privacy>
- Unbounce - <https://unbounce.com/privacy/>
- Zoom - <https://zoom.us/priv>