



Last Reviewed: January 2020

ABN: 36635078456

OUR PRIVACY POLICY

1. About this Policy

Your privacy is important to us, and this policy explains how we will respect it.

As you engage with us, we will receive and collect information about you. This policy will explain how we gather it, what we do with it and how we safeguard it. Please read this before deciding if you want to share your information with us. If you have any questions or concerns, please contact us. We will update this Privacy Policy from time to time. It is your responsibility to inform yourself of any changes to this Privacy Policy.

References to 'SheSaw', 'SheSaw Pty Ltd', 'we', 'our' and 'us' means SheSaw Pty Ltd.

2. What information

Personal Information

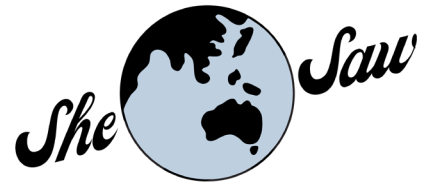
Depending on what products and/or services you enquire about, we may collect the following personal information:

- Your full name
- date of birth,
- gender,
- title,
- contact details (address, phone number, email address, emergency contact details)
- documentation (emergency contact, travel insurance details, passport details, visa information)
- We may also ask for medical information which is considered sensitive under data protection laws
- Any additional information you provide to tailor your trip, such as access or dietary requirements, flight details and accommodation not booked through SheSaw Pty Ltd

When you subscribe to the SheSaw newsletter or blog we will collect and store your full name, country and email address.

Financial Information

SheSaw Pty Ltd does not collect, store or record payment card details via email or telephone. Payments are collected via a third-party vendor (Stripe) to process these payments on our behalf.



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Images

When you are on a SheSaw tour, photos and videos may be taken by a professional photographer, the tour group leader, a SheSaw Pty Ltd employee or a fellow guest that may be used on our website or marketing material. SheSaw's employees or contractors will only take and use photos and videos that include you, with your permission.

If you do not want to be included in photos, let the photographer, employee or guest know that you do not want to be included, and/or do not want the photo to be used by SheSaw Pty Ltd.

Feedback

We may contact you to seek your interest in taking part in surveys and interviews. This may include contacting you with a post-booking or post-trip feedback survey or a telephone interview, to ascertain your experience of the SheSaw booking process or tour.

As part of this feedback process, we may collect your full name, email address, telephone number and booking code.

3. Why we need the information

Legal Basis

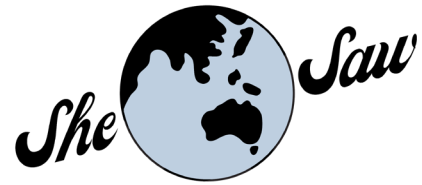
SheSaw Pty Ltd, must have a purpose and lawful basis to collect your information, in accordance with data protection laws. Depending on how and why you interact with us, the legal basis we have may be either:

Legitimate Interest – Information needed to provide a product or service, that does not override your rights and freedoms as an individual. e.g. storing your email address to communicate with you about an upcoming tour.

Legal Obligations - local laws in the country you are visiting may require us to collect and store information about you.

Vital Interest – information such as travel insurance may be vital in the case of an emergency, so we may contact your provider and get you help.

Contract – we may hold your information in order to meet a contractual obligation, such as fulfilling a booking or reservation you have made with us.



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Consent – we will seek your explicit consent before collecting information from you, before sending you marketing materials. You can revoke your consent or object to our marketing at any time.

Bookings and Enquiries

We need your information to provide products and services you have requested from us. Here are some examples of why we need it:

- Your personal information is needed to identify you whilst you are on a tour
- Our suppliers may need information about you to finalise a booking.
- Local laws may also require us to provide, on your behalf, travel documentation to identify you.
- We need your contact details to continue our relationship with you, before, during and after a tour, in order to arrange, confirm, deliver and provide quality assurance on products, and in order to make contact with you, or your next of kin, in the event of an emergency.
- We need your personal and medical details in order to communicate with medical staff and insurance providers, to ensure your safety and enjoyment, and in the case of an emergency, to ensure you receive the assistance you require. Medical information will, however, only be shared with your consent, unless it is in your vital interests or required by relevant laws. By consenting, you are agreeing that we can gather and store this information and use it to ensure your wellbeing.

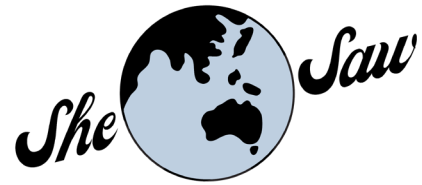
Images

We strive to make each SheSaw tour unique and perspective-shifting. We, or your fellow guests may take photographs and/or videos to capture the special moments that set our tours apart, to share with others. SheSaw may use photos/videos on our website or marketing materials. We will seek your permission before including you in a photo or video or circulating it in any way.

Marketing and Research

SheSaw may use your information to provide you with details of new tours or offers you may be interested in, to send you the SheSaw newsletter, if you have subscribed to it.

As part of our commitment to continuous improvement, we may ask you to provide feedback, via surveys and/or telephone calls on your experience with SheSaw, from initial contact to post-tour. We will use this feedback, de-identified, to inform decision-making and discussions with our partner regarding quality, offerings and marketing strategies.



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Your information and responses may be stored for future reference, however we will de-identify it (remove your name and contact details) where possible.

4. How we get the information

There are several ways we may collect your information:

- You may provide it directly when contacting us via email, phone, letter, web chat or in person, subscribing to our newsletter, blog, or completing a survey or form.
- If you are booking via an agent or third party, they may provide us with your details e.g. a travel agent or member of the party that you are travelling with. These third parties must be familiar with our Privacy Policy and must have your consent to provide us with your information.

5. What we do with the information

Bookings and Enquiries

To manage your enquiry, provide you with a quote or secure your booking, we may share your information with:

- Third Party Operators (i.e. the local operators of our tours)
- Partners (i.e. businesses and social enterprises we work with, and you visit, overseas)
- Travel providers (i.e. airlines)
- Suppliers and Service providers (i.e. hotels)
- Government authorities (immigration departments)

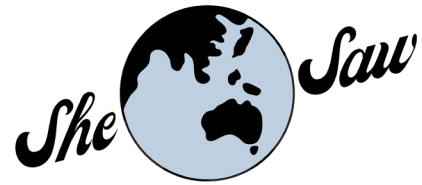
If you book flights through SheSaw, or your trip includes a flight, the relevant personal information will be provided to the applicable airline. We also share your personal information with any local businesses or third-party local operators to ensure your tour is enjoyable and runs as smoothly as possible.

Please be assured only the relevant people will be provided with access to this information.

Any information shared with travel providers is done so via secure methods and the travel provider is responsible for any information they hold in their system.

Marketing

We may ask your permission to post a personal review on our website or in marketing material, with your first name and country.



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Selling

We will not sell your personal information.

Compulsory

Where required by law, we may share your information with an enforcement body (i.e. police), insurance providers or medical personnel. Some reasons for this may be the investigation of fraud, for regulatory reporting and compliance, or if we believe the disclosure is necessary to lessen or prevent a threat to life, health or safety.

6. How and why and where we transfer data

As explained in previous sections, we may need to share your information with businesses and third parties, who may be located overseas. If we do this, we require that these entities have the appropriate privacy, confidentiality and security measures in place, and that we comply with those data protection and privacy laws which apply to us. These third parties are located in but not limited to Australia, Vietnam, India and Cambodia. If you have any specific questions about where or to whom your personal information will be sent, please contact us.

In some jurisdictions, including the EEA, the UK and Australia, data protection laws restrict transferring personal information outside the jurisdiction. In all cases, SheSaw ensures that appropriate safeguards for the purposes of those data protection laws which restrict the trans-border flow of personal information, have been established and are maintained, whether in the form of standard contractual clauses, appropriate inter-company agreements, adequacy measures or through ensuring certification with the US-EU Privacy Shield.

7. Retaining the information

We keep your personal information only for the time needed to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To work out how long this is, we consider the type of information, the reason we are collecting it, the potential risk of harm from unauthorised use or disclosure of the information and legal requirements



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8. Your rights

We want you to feel in control of your information. Depending on relevant data protection laws, there are certain rights you have over your personal information including:

- You can ask us to update any inaccurate, incomplete or out-of-date information we hold about you
- You can ask us to provide you with a copy of the information we hold on you, or that we transfer that information to another service provider
- You may request that we stop processing or using your information
- You may request that we delete any / all information we hold about you
- You may withdraw consent that you have provided to us

Where possible we will comply with your request, however, there may be instances where we cannot fulfil your request, or there will be consequences if we were to fulfil your request. We will always communicate with you about any consequences before going forward, or give you written reasons for any refusal.

If you are subscribed to any promotional marketing newsletters, you have the choice to unsubscribe from these communications by scrolling to the bottom of the e-mail and clicking the 'unsubscribe' link.

Under the GDPR, if you live in the European Economic Area (EEA), you are also entitled to, at any time:

- Withdraw consent to our use of your information for marketing purposes
- Object to the processing of your personal data, especially where we collect your personal data for claimed legitimate interest
- Request your personal information be transferred to yourself or a third party without hindrance in a commonly used format.

You may also wish to make a complaint about the way we have handled your personal information or other interference with your privacy rights.

You can exercise any of these rights at any time by contacting SheSaw or your relevant privacy or data protection authority.

9. Complaints

If you have any questions about this Privacy Policy or are concerned about how we have handled your personal information, we would like to hear from you. We treat privacy matters seriously and will endeavour to correct the matter.



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You may also request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information, which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, contact us.

We will contact you within 48 hours of receiving your enquiry or request to begin to investigate your concerns and establish for you a likely timeframe for the resolution of your matter. At the conclusion of our investigations, we will write to you with the outcome and any actions that will be taken. If you are not satisfied with this response, you may escalate your complaint to the relevant regulatory body or your local data protection authority.

If you are in the EU, please follow this link to locate the data protection authority most relevant to you: https://edpb.europa.eu/about-edpb/board/members_en

10. How we keep your information secure

SheSaw is dedicated to keeping your personal information secure. We have implemented various physical, electronic and managerial security procedures in order to protect your information from loss and misuse, and from unauthorized access, modification, disclosure and interference.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you **transmit** to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. Cookie and Third-Party Links

When you come to our website (www.shesaw.com) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.



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Cookies

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies, but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our

website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience.

When you visit certain sections of the website, Google Analytics, a website analytics service provided by Google Inc ("Google"), will place cookies on your computer's browser. The information generated by the cookies about your use of the website is transmitted to Google. This information is then used for the purpose of compiling statistical reports to enable us to measure and analyse the number of visits to the site and its pages, the average time spent on the site and the pages viewed. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personal information of visitors to our website. We will not associate any data gathered via the use of cookies with any personal information from any source as part of our use of Google Analytics. For further information about Google Analytics please visit www.google.com/analytics and for details of Google Analytics' Privacy Policy, please visit www.google.com/intl/en.

You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on which you may access at <https://tools.google.com/dlpage/gaoptout/>.

Third party sites

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that SheSaw Pty Ltd is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each website that collects personal identifiable information.

Thank you for reading.