

# Privacy Policy

**GREAT SOUTHERN RAIL LIMITED**  
**ACN 079 476 949**

and

**GREAT SOUTHERN RAIL TRAVEL PTY LTD**  
**ACN 088 933 742**

## Purpose

This Privacy Policy Statement (**Privacy Policy**) is prepared in accordance with the Australian Privacy Principles ('**APPs**') in the Commonwealth *Privacy Act 1988* (**Privacy Act**). The APPs prescribe minimum standards for the way in which organisations deal with individuals' personal information. Under the *Privacy Act*, personal information generally includes information about an identified individual, or an individual who is reasonably identifiable.

## Your Privacy is Important to Us

Great Southern Rail Limited, Great Southern Rail Travel Pty Ltd and any related companies that may be incorporated from time to time (collectively referred to as **Great Southern Rail, we, us, and our**) are committed to the protection of your personal information in accordance with the APPs.

This Privacy Policy explains in general terms how we collect, store, use and disclose your personal information, and sets out your right to request access to information we hold about you. In the case of employees, employee records which are exempt under the *Privacy Act* will not be subject to this Privacy Policy.

## Collection of Personal Information

Great Southern Rail only collects personal information which is necessary in connection with its business purposes. These purposes include:

- to provide you with travel services on Great Southern Rail trains;
- to answer your queries, and provide you with information in relation to travel and accommodation options, packages, and other activities; and
- to arrange, process and make reservations for travel, accommodation, packages and other activities on your behalf, to invoice you for confirmed travel arrangements, and to complete related transactions.

The specific types of personal information collected and used by Great Southern Rail varies according to the purpose for collection, but in general this information includes:

- your name, address, and contact details (e.g. telephone number, facsimile number and email address);
- credit card details and pensioner/concession information (if applicable);
- travel, accommodation and activity details;
- vehicle details (e.g. model, make and registration);
- any health issues that may be relevant in relation to your proposed travel or activity arrangements, including dietary requirements (if any); and
- any other special requirements that you may have.

We will assume you have consented to the collection, use and disclosure by us of any health-related information which you provide to us for the purposes set out in this Privacy Policy, unless you tell us otherwise.

Great Southern Rail collects most of the personal information it requires directly from you, by way of written forms and other correspondence (such as facsimiles, letters and emails), by telephone, in person, by our representatives, and via our website. We may also collect personal information about you from third parties, including travel agents, booking agents, travel representatives, market research companies contracted by us to obtain information to assist us in improving and marketing our services, and brochure distribution companies that collect information for the purpose of providing you with information about Great Southern Rail's services.

It is important that Great Southern Rail collects the information it requires about you. Without this information, we may not be able to provide you with our services.

We will always use fair and lawful means for collecting your personal information, and we will enable you to interact with us anonymously (and even pseudonymously) whenever possible, practicable and lawful.

Before providing personal information about another individual to Great Southern Rail (such as when making a travel booking for a family member travelling with you), you must first ensure that they are aware of:

- the disclosure of their information to Great Southern Rail and the purposes for which the information is collected by us; and
- that individual's ability to request access to the personal information held about them by Great Southern Rail, and to advise us if they think the information is inaccurate, incomplete, irrelevant, misleading or out-of-date.

### **Use and disclosure of Personal Information**

Great Southern Rail may use and disclose your personal information for the primary purpose for which the information was collected (see above, Collection of Personal Information), reasonably expected secondary purposes, where you have consented, and otherwise in accordance with the APPs, including:

- to process and make reservations for your travel, accommodation and activity arrangements, and to facilitate other transactions relating to those arrangements (including disclosing your information to travel agents, booking agents, travel representatives accommodation and activity service providers and other carriers, tour operators and transport companies who will be providing us or you with services in relation to your travel plans);
- to provide you with information from time to time about the goods and services offered by Great Southern Rail and third parties, including updates, special deals and other information about travel options, packages and activities that can be booked through Great Southern Rail. (You may notify us by email at [privacyofficer@gsr.com.au](mailto:privacyofficer@gsr.com.au) or by writing to our Privacy Officer at the address set out below at any time if you do not wish to receive this information);
- to maintain a relationship with you as a member of our Train Trekkers Club, All Aboard Club or other member programs;
- to conduct surveys and other market research to assist us in assessing and improving our services;
- where required or authorised by law; and
- where required for administrative purposes and all other purposes reasonably associated with Great Southern Rail's business.

We may disclose your information to third party contractors and service providers engaged by Great Southern Rail from time to time to provide goods or services to us or on our behalf, including entities located overseas (including email and mail handling providers, financial and credit service providers, market research providers, caterers, and those engaged to provide on-train services including luggage handling and check-in). Where we do disclose your personal information outside Australia, the countries in which such recipients are likely to be located are the United States of America, the United Kingdom and Japan. Where third parties such as these are engaged, we will ensure that they are bound by, or contractually required to uphold, the standards of the APPs.

Your information may be shared between the companies in the Great Southern Rail group, including Great Southern Rail Rv "Nf , Great Southern Rail Travel Pty Ltd"cpf 'y kj "cp{ related companies that are incorporated from time to time.

## **Data Quality, Storage and Security**

We strive to ensure that all personal information held in our records is accurate, complete, relevant and up-to-date.

Personal information is held in a combination of electronic (and in some cases, hard copy) records stored securely at Great Southern Rail's facilities. Electronic information is protected by password security and other data protection measures.

Access to personal information is restricted, in accordance with Great Southern Rail's procedures, to those personnel whose job functions require access to that information. Certain

administrative functions may from time to time be contracted out to third parties, and in these cases appropriate security measures are implemented to ensure the security and integrity of all personal information.

## **Access and Correction**

You may obtain access to the information Great Southern Rail holds about you by writing to our Privacy Officer as detailed below.

In accordance with the APPs, we may deny access to requests for access to information in certain circumstances, including where:

- providing access would have an unreasonable impact upon the privacy of another individual;
- providing access to the information would be unlawful, or Australian law or an order of a court/tribunal permits us to deny access;
- we have reason to suspect that unlawful activity or misconduct of a serious nature relating to our functions or activities has been engaged in, and giving access would be likely to prejudice us taking appropriate action;
- the information relates to existing or anticipated legal proceedings, or would prejudice Great Southern Rail's commercial negotiations with you or other individuals; or
- in our opinion, the request is frivolous or vexatious.

If we are required or authorised by law to refuse to provide you with access to your personal information, we will give you written reasons for that refusal and how you may complain about our decision.

We may require identification documents to accompany an access request and may also charge a fee for providing access (limited to the amount of our reasonable expenses incurred in responding to your request, including photocopying and administrative expenses). We will not charge a fee for you to lodge a request for access.

We may provide you with access to your personal information by hard copy, or by allowing you to view our records.

We will correct any personal information we hold about you where we become aware it is inaccurate, incomplete, irrelevant, misleading or out of date. Please let us know if any of your personal details change.

## **Complaints, Concerns or Further Information**

If you believe we have breached our obligations under the *Privacy Act* (including the APPs), or if you have any other queries or concerns regarding your privacy and the way we handle your personal information, please contact Great Southern Rail's Privacy Officer using the contact details below. We will endeavour to provide you with further information, or in the case of a complaint we will investigate your complaint and provide you with a response within 14 days (or such shorter period as agreed).

## **Changes to Privacy Policy**

This Privacy Policy is current as at August 2014. Great Southern Rail may review and update this Privacy Policy from time to time to reflect changes in the law, our business practices, procedures and structure, and the community's changing privacy expectations. The latest version of the Privacy Policy will be available on our website at [www.greatsouthernrail.com.au](http://www.greatsouthernrail.com.au). You may also contact Great Southern Rail's Privacy Officer to obtain the latest version of the Privacy Policy at any time.

## **Point of Contact**

To request access to personal information held about you in Great Southern Rail's records, to make a privacy related complaint, to obtain more information about this Privacy Policy or to enquire about privacy matters generally, please contact Great Southern Rail's Privacy Officer as follows:

The Privacy Officer  
Marketing Department  
Great Southern Rail  
PO Box 445  
Marleston Business Centre  
SA 5033

Email: [privacyofficer@gsr.com.au](mailto:privacyofficer@gsr.com.au)