

# PRIVACY POLICY

## Introduction

### General

This Privacy Policy explains how Murin generally handles your personal information. We may also provide more specific information relating to particular products or services in our privacy collection notices.

We will update this policy on our website if we change the way we handle personal information.

This Privacy Policy does not apply to Murin employee records and contractor records.

Who is Murin?

This Privacy Policy applies to Murin Association Inc. and its related bodies corporate (referred to as “Murin”, “we” and ours).

### Information we collect.

#### General

The types of personal information that we collect and process about you will depend on our relationship with you. It will include some or all of the following:

- General information about you: your name, title, gender, date of birth, contact details, passport, or other identification details (which may include your image).
- Contact details: such as phone number, address, email address, and social media handle.
- Travel details: such as travel itinerary, baggage, seat preferences and additional requests.
- Payment details: such as credit or debit card number and expiry date.
- Your use of our products and services: such as use of our in-vehicle entertainment systems and your previous travel arrangements with us.
- CCTV images: captured in our airport terminal and other premises.
- Our interactions with you: such as any feedback, complaints, compliments, claims you have made (such as in relation to lost luggage), responses to market surveys, records of any correspondence and interactions with us and our staff (including in person, online, by telephone or email and via social media).
- Incidents: details about any incidents that you are either involved in or that you witness, in connection with your flight or any of our products or services.
- Information used to prevent and detect fraud: an assessment of whether your transaction is potentially fraudulent, including the historical and other information used by our service provider to make this assessment.
- Wi-Fi use: if you use Wi-Fi in our terminal or onboard our vehicles, we collect information about you, your device and how you use the Wi-Fi service.
- COVID 19 contact tracing.
- Shareholders/Board Member: We may collect certain details about you to register and verify your interest in our securities. This includes your name, address, number of shares held, tax file number and bank account details.

Certain aspects of your personal information, for example details of your travel documentation, payment details and contact information, are required for many of our products and services and if you fail to supply such information as requested for specific services, we may be unable to provide you with the products and services in full.

### Sensitive personal information

Under privacy laws, certain categories of personal information are considered particularly sensitive and therefore as needing additional protection. These categories include information about health,

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racial or ethnic origin, political opinions, religious beliefs, trade union membership or your sexual orientation. Sensitive information may also include genetic and biometric data. Information concerning criminal convictions and offences is also viewed as sensitive.

We may collect and handle your sensitive personal information, for example, when you request special medical or access assistance.

We will ask you for your consent to handle this type of personal information, to the extent required under applicable laws, for example under the Australian Privacy Act.

## How we collect personal information

How we collect personal information about you will depend on our relationship or interactions with you.

### Directly from you

We mainly collect information directly from you, for example, when you use our website or social media, you call or write to us, we interact with you in person, such as when you use our products and services or participate in promotions, or you buy or sell shares in our company.

### Indirectly

There may be occasions when we collect information about you from someone else, such as:

- travel agents, booking agents and other airlines, including when you make an inquiry but do not complete a booking.
- When someone else books or purchases goods or services on your behalf
- Our service providers, including providers of data analysis services
- Airports and their service providers
- Freight and associated service providers
- Third parties that provide us with marketing leads
- Immigration, customs, border, security, law enforcement and other government and regulatory authorities

If you provide us with information about other individuals, regardless of whether you are travelling together, you are responsible for telling those individuals and letting them know that they can find a copy of this Privacy Policy on our website.

## How we use your personal information

We may use your personal information for the following purposes:

- To provide and administer our travel products and services: to verify your identity, to contact you about your orders and bookings and travel, freight, and other arrangements, to process payments, for quality assurance and training purposes, such as training our staff, testing our systems, and managing our suppliers.
- To provide customer support: to handle queries, complaints, and claims.
- To comply with our legal obligations and for safety and security purposes: to ensure the safety and security of all passengers when travelling with us, including investigating security and screening issues. We may process your personal information to comply with our regulatory requirements including in relation to immigration, customs and security or dialogue with regulators, as applicable, which may include disclosing your personal information to third parties, the court service, regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so.
- To detect and prevent fraudulent activity throughout our business operations
- To conduct market, consumer, and other research: to improve our products, services, and marketing activities, including our websites, and to generate consumer insights that help us to market more efficiently and to be more relevant to you.

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- To ensure website content is relevant: including to ensure that content from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers.

We may also combine the information that we collect and hold about you.

### Disclosure of personal information

We may disclose your personal information to third parties in connection with:

- goods and services that you have bought through us or that we provide to you
- our legal obligations, responding to complaints and claims, and fraud detection and prevention
- security, customs, and immigration purposes

including:

- Other carriers on your itinerary so they can provide goods and services to you
- various law enforcement agencies, regulatory authorities and governments around the world and their service providers
- such other third parties mentioned in the “How we use your personal information” section above

### How we hold information and keep it secure

#### IT Security

We hold your personal information in a combination of hard copy and electronic files. We use third party information system providers who may store or have access to your personal information.

When you book flights or access information about your account, a secure server is used. Secure Sockets Layer (SSL) encrypts the information you send through this website.

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain physical, electronic, and procedural safeguards to protect your personal information in accordance with data protection legislative requirements and industry standards.

### Privacy complaints and further information

If you have a concern about your privacy or you have any query on how your personal information is collected or used please contact us using the details below. We will respond to your query or complaint within a reasonable time.

If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner.



**Chris Tedcastle**  
**General Manager**  
**16<sup>th</sup> March 2021**

**MURRIN ASSOCIATION INCORPORATED**

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