



Privacy Policy

1. About our Privacy Policy

- 1.1 The privacy of your Personal Information is important to The Entrance Red Bus Services Pty Ltd ACN 000 103 524. We respect your rights to privacy and rights under the Privacy Act and are committed to complying with the requirements of the Privacy Legislation in the collection and handling of your Personal Information.
- 1.2 This policy explains how we collect, retain, process, share, transfer and handle your Personal Information and describes the kinds of Personal Information we collect, use, disclose and our purposes for doing so.
- 1.3 We use some defined terms in this policy. You can find the meaning of each defined term at the end of this policy.
- 1.4 Personal Information is information which may be used to reasonably identify you. For example, your name, address, date of birth, trip and travel details, credit/debit card number and expiry date, gender, email address and telephone number are generally considered to be Personal Information. Personal Information may also include information we collect about your individual preferences, as well as information about any health issues or special needs relevant to your travel arrangements.
- 1.5 Other details that relate to passengers' travel and information relevant to concession (student or pension) fares are also collected. For school students, we also collect details of gender, grade and parent/guardian contact details.
- 1.6 Other than travel-related health information, we generally do not collect sensitive information such as your political or religious beliefs, ethnic background or sexual preference. We will only collect sensitive information with your consent, as required by law or where necessary in accordance with the Australian Privacy Principles (**APPs**) or the Act.
- 1.7 We recognise the sensitivity of receiving credit card information from customers in the course of its business. We will only use credit card information for booking and transactions purposes and not for any other purpose.
- 1.8 This policy applies to your Personal Information when you use our Website, as well as your other dealings and engagements with us.
- 1.9 For the avoidance of doubt, unless stated otherwise, this policy will govern our collection of your Personal Information irrespective of the forum.



- 1.10 This policy may be updated from time to time and the most up to date version will be published on our Website. We encourage you to check our Website periodically to ensure that you are aware of our current policy.
- 1.11 Your continued usage of our Website and/or services will be taken to indicate your acceptance of the terms of this privacy policy insofar as it relates to our Website.

2. Why we collect Personal Information

- 2.1 We collect and use personal information about our customers to provide passenger transport services (including school student transport) and to assist our internal administration and operations. This includes managing student travel and behaviour, processing bookings and payments, accounting, record keeping, system development, testing and staff training. If we do not collect such personal information we may be unable to provide you with our services.
- 2.2 When you visit our Website, we collect Personal Information so that we can provide you with services and improve and customise your experience with us. We only collect Personal Information if it is reasonably necessary for us to carry out our functions and activities.
- 2.3 The purposes for which we collect and hold your Personal Information include:
- (a) to deliver our services to you;
 - (b) to confirm your identity and process your transactions;
 - (c) in connection with your attendance or participation in events or activities conducted by us or our partners;
 - (d) to manage our relationship with you, evaluate our business performance and build our customer database;
 - (e) to provide you with information about our services, events or activities;
 - (f) to process transactions;
 - (g) to enable you to participate in any bounty promotion, competition, survey and/or enable you to subscribe to mailing lists/newsletters and interact or follow our social media pages, including but not limited to, Twitter, Telegram, Facebook and Instagram;
 - (h) to respond to your requests and seek your feedback;
 - (i) to conduct research, compare information for accuracy and verification purposes,



compile or analyse statistics relevant to the operations of our business;

- (j) to facilitate our internal business operations, including fulfilment of any legal and regulatory requirements and monitoring, analysing and improving the performance and functionality of our Website and investigating breaches of or enforcement of any legal terms applicable to our Website;
- (k) to protect our property, the Website or our legal rights including to create backups of our business records;
- (l) to manage risk and protect our Website from fraud by verifying your identity and helping to detect and prevent fraudulent use of our Website;
- (m) for direct marketing purposes; and
- (n) to manage our business, including analysing data collected from our Website concerning visits and activities of users on our Website. This analysis helps us run our Website more efficiently and improve and personalise your experience online. We use information from third party services such as Google Analytics to help further improve your experience in using our Website.

3. What Personal Information do we collect?

3.1 The kinds of Personal Information we collect will depend on the type of interaction you have with us. Generally, the kinds of Personal Information we collect may include:

- (a) your name, address (postal and residential), email address, telephone number(s), date of birth and gender when you register with us;
- (b) travel information, such as intended travel dates, place of departure and intended destination and any special travel arrangements;
- (c) concession card details (eg type and ID number);
- (d) identification information such as driving licence number and driving licence details;
- (e) information from third party sources such as data providers and credit organisations, where permitted by law;
- (f) details of the device you have used to access any part of our Website, including carrier/operating system, connection type, IP address, mobile payment methods, interaction with other retail technology such as use of NFC Tags or QR Codes which information may be collected and used by us automatically if you use our Website, through the browser on your device or otherwise;



- (g) demographic information;
- (h) location data;
- (i) your connections with others whose personal information we may collect or hold;
- (j) credit card, debit card or any other online payment methods or gateways and direct debit details for your bank account in order to process payment transactions;
- (k) transaction details relating to your use of our services or rewards; and
- (l) footage and/or images of you from the security surveillance cameras on buses or at our premises.

3.2 Your telephone calls to us may also be recorded for training and quality assurance purposes.

4. With whom do we share Personal Information?

4.1 We may disclose Personal Information collected from you:

- (a) to our related entities, employees, officers, agents, contractors, other companies that provide services to us, sponsors, government agencies or other third parties to satisfy the purposes for which the information was collected (as outlined in clause 2.3 of this policy) or for another purpose if that other purpose is closely related to the primary purpose of collection and an individual would reasonably expect us to disclose the information for that secondary purpose;
- (b) to third parties who provide services to us;
- (c) Government and non-government schools;
- (d) Transport for New South Wales;
- (e) if the disclosure is required by a law, or legal process, requested by a government agency or other third parties pursuant to a subpoena, court or other legal process with which we are required to comply;
- (f) to any other person, with your consent (express or implied); and
- (g) to facilitate the sale of all or a substantial part of our assets or business or to companies with which we propose to merge or who propose to acquire us and their advisers.

4.2 In addition to the above recipients, we will disclose your Personal Information if we are required to do so under law or if the disclosure is made in connection with either the normal



operation of our business in a way that you might reasonably expect, for example, if such disclosure is incidental to IT services being provided to our business or for the resolution of any dispute that arises between you and us. This disclosure may involve your Personal Information being transmitted overseas.

- 4.3 We may also disclose your Personal Information if you choose to participate in online based service offerings whereby your Personal Information may be disclosed to and stored in software which is operated by a third party intermediary as part of your dealings with us. Personal Information disclosed in this manner may be transmitted offshore, including to the United States of America. When you provide your personal information to us, you consent to the disclosure of your personal information outside of Australia and acknowledge that other countries may have different data protection rules to Australia and that we are not required to ensure that the overseas recipients deal with that personal information in compliance with Privacy Legislation. We will, however, take reasonable steps to ensure any overseas recipient to which we provide your Personal Information deals with such information in a manner consistent with the APPs.
- 4.4 In the event of a proposed restructure or sale of our business (or part of our business) or where a company proposes to acquire or merge with us, we may disclose Personal Information to the buyer and their advisers without your consent subject to compliance with the Privacy Legislation. If we sell the business and the sale is structured as a share sale, you acknowledge that this transaction will not constitute the 'transfer' of Personal Information.
- 4.5 We will not sell, trade or rent your Personal Information to any third parties for marketing purposes without your consent.

5. How we collect and store data and transmit Personal Information

- 5.1 We usually collect and store information in paper, physical and electronic form provided by you in person or when you communicate with us by telephone, email, web-based form, letter, facsimile or other means, including when:
- (a) you contact us over the phone;
 - (b) we provide you with our services via telephone, email or our Website;
 - (c) we provide you with assistance or support for our services;
 - (d) you participate in our events or activities or on our social media pages;
 - (e) you request that we provide you with information concerning our services;



- (f) you upload or submit information to access a rewards program or to submit a review; or
- (g) you complete any forms requesting information from you, including on registration with us, complete any survey or provide feedback to us concerning our services.

5.2 Where practicable we will only collect information from you personally.

5.3 Please note that we use our own and third party computer servers including our Website hosts, data backups and payment gateway(s), which may be located overseas and your Personal Information will likely be stored and transmitted overseas as part of the normal operation of our business.

5.4 We also collect information from your computer or mobile device automatically when you browse our Website. This information may include:

- (a) the date and time of your visit;
- (b) your domain;
- (c) locality;
- (d) operating system;
- (e) the server your computer or mobile is using to access our Website;
- (f) your browser and version number;
- (g) search terms you have entered to find our Website or access our Website;
- (h) pages and links you have accessed both on our Website and on other websites;
- (i) the last website you visited;
- (j) the pages of our Website that you access; and
- (k) your IP Address.

5.5 While we do not use some of this information to identify you personally, we may record certain information about your use of our Website such as which pages you visit and the time and date of your visit.

5.6 It may be possible for us to identify you from information collected automatically from your visit(s) to our Website. If you have registered an account with us, we will be able to identify you through your user name and password when you log into our Website. Further, if you access our Website via links in an email we have sent you, we will be able to identify you.



5.7 The device you use to access our Website may collect information about you including your location using longitude and latitude co-ordinates obtained through GPS, Wi-Fi or cell site tri-angulation. For information about your ability to restrict the collection and use of such information, please use the settings available on your device.

5.8 We may use statistical analytics software tools such as Google Analytics and software known as cookies which transmit data to third party servers located overseas. To our knowledge, Google Analytics does not identify individual users or associate your IP Address with any other data held by Google.

6. How we protect your Personal Information

6.1 We will endeavour to take all reasonable steps to keep secure and protect any Personal Information which we hold about you, including:

- (a) securing our physical premises and digital storage media;
- (b) placing password protection and access control over our information technology systems and databases to limit access and protect electronic information from unauthorised interference, access, modification and disclosure; and
- (c) taking regular back-ups of our electronic systems.

6.2 Notwithstanding that we will take all reasonable steps to keep your Personal Information secure, data transmission over the internet is never guaranteed to be completely secure. We do not warrant the security of any information you transmit to us or from any online services.

7. Use of Cookies

7.1 When you visit our Website or the website of any of our partners, we and our partners may use cookies and other tracking technology (**Cookies**) to recognise you and customise your online experience. Cookies are small files that store information on your computer, mobile phone or other device. They enable us to recognise you across different websites, services, devices and/or browsing sessions. Cookies also assist us to customise online content and advertising, save your preferences for future visits to the Website, measure the effectiveness of our promotions, prevent potential fraud and analyse your and other users' interactions with the Website.

7.2 If you do not wish to grant us the right to use cookies to gather information about you while you are using our Website, then you may set your browser settings to delete, disable or block certain Cookies.



- 7.3 You may be requested to consent to use of Cookies when you access certain parts of our Website, for example, when you are asked if you want the Website to “remember” certain things about you.
- 7.4 Certain aspects and features of the Website are only available through use of Cookies. If you disable Cookies, your use of the Website may be limited or not possible or parts of our Website may not function properly when you use them.

8. How to access or correct your Personal Information or make an enquiry or complaint

- 8.1 If you have any queries in relation to this policy, you wish to access or correct the Personal Information we hold about you, or make a complaint, please contact us in writing at:

Email: info@redbus.com.au; or

Mail: Privacy Officer

The Entrance Red Bus Services Pty Ltd
PO Box 3186
BATEAU BAY NSW 2261

- 8.2 We aim to acknowledge receipt of all privacy complaints from you within 5 working days and resolve all complaints within 30 days. Where we cannot resolve a complaint within that period, we will notify you of the reason for the delay as well as advising the time by which we expect to resolve the complaint.
- 8.3 In order to disclose information to you in response to a request for access we may require you to provide us with certain information to verify your identity. There are exceptions under the Privacy Legislation which may affect your right to access your Personal Information – these exceptions include where (amongst other things):
- (a) access would pose a serious threat to the life, health or safety of any individual;
 - (b) access would have an unreasonable impact on the privacy of others;
 - (c) the request for access is frivolous or vexatious;
 - (d) the information relates to existing or anticipated legal proceedings between you and us and the information would not otherwise be accessible by the process of discovery;
 - (e) giving access would reveal our intentions in relation to negotiations with you;
 - (f) giving access would be unlawful;



- (g) denying access is required or authorised by or under an Australia law or a court/tribunal;
- (h) the information relates to commercial sensitive decision making process; or
- (i) giving access would prejudice enforcement related action.

8.4 We may (depending on the request) charge you a fee to access the Personal Information. We will inform you of any fees payable in respect of accessing your Personal Information prior to actioning your request. All requests for Personal Information will be handled in a reasonable period of time (within 30 days after the request is made).

8.5 If you wish to have your Personal Information deleted, please contact us using the details above and we will take reasonable steps to delete the information (unless we are obliged to keep it for legal or auditing purposes).

8.6 In the event that you believe that there has been a breach of the Privacy Legislation, we invite you to contact us as soon as possible.

8.7 If you are not satisfied with our handling of a complaint or the outcome of a complaint you may make an application to the Office of the Australian Information Commissioner or the Privacy Commissioner in your State or Territory.

9. Definitions used in this policy

- (a) **Australian Privacy Principles** or **APPs** means the principles set out in Schedule 1 to the Privacy Act.
- (b) **IP Address** means a number automatically assigned to your computer which is required when you are using the internet and which may be able to be used to identify you.
- (c) **Personal Information** has the meaning set out in the Privacy Act.
- (d) **Privacy Act** means the *Privacy Act 1988 (Cth)* as amended from time to time.
- (e) **Privacy Legislation** means such laws as may place requirements on the handling of Personal Information under the Privacy Act and the Australian Privacy Principles.
- (f) **Third Party Sites** means online websites or services that we do not own or control, including websites of our partners
- (g) **Website** means www.redbus.com.au and/or any other website as we may operate from time to time.



- (h) **we, our, us** and similar terms means The Entrance Red Bus Services Pty Ltd and our related entities.

- (i) **you, your** and similar terms means, as the context requires (1) you, when you use our Website; and/or (2) you, during your dealings with us as a customer; and/or (3) any agent providing your Personal information to us; and/or (4) any agent dealing with us on your behalf.