



Group Technology

Online Republic Privacy Policy

What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- [What personal information we collect about you](#)
- [How we use the personal information we collect](#)
- [How we share the personal information we collect](#)
- [How we store and secure the personal information we collect](#)
- [How to access and control your personal information](#)
- [How we transfer personal information we collect internationally](#)
- [Other important privacy information](#)
- [Additional data protection provisions](#)

Online Republic, “we” and “us” refers to Online Republic Group Ltd and all of our travel divisions. We offer a wide range of travel services, including our car, motor home and cruise booking services. We refer to all of these products, together with our other services and websites as "Services" in this policy.

This Privacy Policy covers the personal information we collect about you when you use our services, or otherwise interact with us, unless a different policy is displayed. If you do not agree with this policy, do not access or use our Services or our website or interact with any other aspect of our business.

Please note, we provide Services:

- directly to customers;
- under contract with a third-party organization (for example your employer).

Where we provide Services under contract with a third party, you should refer to that third party’s privacy policy for additional information about how your personal data is processed.

What information we collect about you

We collect personal information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

Information you provide to us

We collect personal information about you when you input it into the Services, including the Online Republic products you use, whether by posting, sending or sharing, or otherwise providing it directly to us.

Account and Profile Information: We collect personal information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make bookings through the Services. You also have the

option of adding a display name, profile photo, and other details to your profile information to be displayed in our Services. We keep track of your preferences when you select settings within the Services.

Personal information you provide through our products: We collect your personal information when you fill in booking information or when you speak to our customer services personnel including:

- Name - so we can address you;
- Age - rates and insurance premiums differ with ages;
- Country of residence - some suppliers vary rates by country of residence;
- Telephone number and email - to contact you on; and
- Credit Card information - to charge you once your booking is confirmed.

Personal information you provide through our websites: The Services also include our websites owned or operated by us. We collect other personal information that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide personal information to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

Personal information you provide through our support channels: The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you have and any other related information that would be helpful in resolving the issue.

Payment Information: We collect certain payment and billing information when you make a booking or enquiry, to charge you once the booking is confirmed. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

Information we collect automatically when you use the Services

We collect personal information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

Your use of the Services: We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use, the links you click on and frequently used search terms. The information we collect about your use of the Services is limited to clickstream data about how you interact with and use features in the Services, in addition to content-related information described in "*Information you provide through our products*" above.

Device and Connection Information: We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you access our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.

Cookies and Other Tracking Technologies: Online Republic and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our [Cookies and Tracking Notice](#), which includes information on how to control or opt out of these cookies and tracking technologies.



Information we receive from other sources

We receive personal information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

Other users of the Services: Other users of our Services may provide information about you when they submit content through the Services. For example, we may receive your email address from other Service users when they provide it in order to add you to the booking or invite you to the Services.

Other services you link to your account: We receive information about you when you link a third-party service with our Services. For example, if you create an account or log into the Services using your Google or Facebook credentials, we receive your name and email address as permitted by your Google or Facebook profile settings in order to authenticate you. The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

Online Republic Partners: We work with a global network of partners who help us market and promote our products, generate leads for us, and resell our services. We receive and share information with these partners, such as billing information, contact information, and what country you are in.

Other Partners: We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

How we use information we collect

How we use the personal information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Our primary purpose in collecting your personal information is to help with a smooth and efficient booking process for you. Having your information allows us to provide services to best suit your needs and make your experience quick and easy.

Below is more information about the specific purposes for which we use the personal information we collect about you.

To provide the Services and personalize your experience: We use personal information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in and provide customer support. We combine personal information about you and your activities to provide an integrated experience, such as to allow you to find information from one Service while searching from another or to present relevant product information as you browse across our websites.

For research and development: We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services. For example, to improve a certain feature, we automatically analyse recent interactions of users and how often they use the feature to gather the most relevant information. We automatically analyse and aggregate frequently used searches to improve the accuracy and relevance of suggested products. In some cases, we apply these learnings across our Services to improve and develop similar features or to better



integrate the services you use. We also test and analyse certain new features with some users before rolling the feature out to all users.

To communicate with you about the Services: We use your contact information to send transactional communications via email and within the Services, including confirming your booking, reminding you for payments, responding to your comments, questions and requests, providing customer support, and sending you notices. We also send you communications as you onboard to a Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases, you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

To market, promote and drive engagement with the Services: We use your information, including contact information and information about how you use the Services, to identify and send promotional communications that may be of specific interest to you, including by email and by displaying Online Republic ads on other companies' websites and applications, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about latest deals that we think may be of interest to you. We also communicate with you about new offers, promotions and contests.

Customer support: We use your personal information to resolve the issues you encounter, to respond to your requests for assistance and to improve the Services.

For safety and security: We use personal information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

To protect our legitimate business interests and legal rights: Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

With your consent: We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission. **You may withdraw this consent at any time.**

How we share information we collect

To complete your booking, we may pass your information on to our suppliers.

We also share personal information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services. These parties include:

Service Providers: We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

Online Republic Partners: We work with a global network of partners who help us market and promote our products (for example, by providing consulting and sales services), who generate leads for us, help us improve our products and Services and resell our Services. We may share your information with these partners in connection with these services, such as to assist with marketing and promotions, or as part of our agreement with them.



With your consent: We share information about you with third parties (including Online Republic partners and resellers) when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights: In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Online Republic, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Sharing with affiliated companies: We share and transfer personal information with affiliated entities as part of our global operations. We may also share or transfer information in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

We will not sell or rent any personal information about you to a third party.

How we store and secure information we collect

Information storage and security

We use reasonable technical and organizational measures to secure your personal information.

We use reputable data hosting service providers in the United States, Australia, New Zealand and Ireland to host the information we collect

Security of transactions

Our secure booking server uses encryption to ensure the industry standard levels of security. This is shown by the padlock in the closed position at the base of your browser screen. Any information, including credit card details, that you enter and submit on this page will be encrypted and securely transmitted. When your transaction is complete your information is stored in an encrypted state. All information transmitted on the booking page is done using SSL (Secure Sockets Layer). SSL uses a cryptographic system that uses two keys to encrypt data, which are a public key, and a private or secret key known only to the recipient of the message.

How long we keep information

How long we keep personal information we collect about you depends on the type of information, as described in further detail below.

Account information: We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyse personal characteristics about you.



Marketing information: If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your account. We retain information derived from cookies and other tracking technologies for a reasonable period from the date such information was created.

Any other personal data will be retained for the purposes of our business dealings and in meeting our legal requirements.

Once personal data is no longer needed, as outline above, we will take reasonable steps to securely destroy or de-identify that information unless we are prevented from doing so by law. If destruction or de-identification is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations. Depending on relevant data protection laws, you may have additional rights which are described in the *Additional Data Protection Provisions*.

Data subject rights: You have the following rights:

- To ask for and receive details about the personal information we hold about you;
- To request a copy of your personal information; and
- To correct or complete any inaccuracy or omission in your personal information.

You can exercise some of the choices by logging into the Services and using settings available within the Services or your account. For all other requests, you may contact us as provided in the [Contact](#) section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person.

If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Access and update your information: Our Services give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

Deactivate your account: If you no longer wish to use our Services, you may be able to deactivate your Services account by changing your account settings. Otherwise, please contact us as provided in the [Contact](#) section below to request assistance. Please be aware that deactivating your account does not delete your information. Your personal information remains visible to other Service users based on your past participation within the Services. For more information on how to delete your information, see below.

Request that we stop using your information: In some cases, you may ask us to stop accessing, storing, using and otherwise processing your personal information where you believe we don't have the appropriate rights to do so. For example, if you believe an account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy.



Withdraw consent: Where you gave us consent to use your personal information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your personal information for marketing purposes by contacting us, as provided below.

Opt out of communications: You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings.

Turn off Cookie Controls: Relevant browser-based cookie controls are described in our Cookies and Tracking Notice.

How we transfer information we collect internationally

We collect information globally. As part of our global operations, we may transfer, process and store your information with affiliates in countries outside of your country of residence. We primarily store information in the United States, Australia, New Zealand and Ireland.

We may also transfer, process and store your information outside of your country of residence to wherever our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it and ensure we comply with relevant data protection legislation.

Other important privacy information

Links and Widgets

Links: The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

Third-Party Widgets: Some of our Services contain widgets and social media features, such as the Facebook "like" button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

We are not responsible for the privacy or security practices of other organizations, which may be different than this policy.

To the extent that we may be regarded as a joint controller with any third-party site, including Facebook, the terms of the joint controllership arrangement are as detailed on the third-party site.

Our policy towards children

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16 without parental or guardian consent, unless allowed by relevant local laws. If we become aware that information about a minor has been collected without the appropriate consent or approval, we will take steps to delete such information. If you become aware of any circumstance where we have collected information about a minor without the appropriate consent or approval, please contact our support services.



Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will notify you by sending you an email notification. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account, as outlined above.

Contact Us

If you have questions or concerns about how your information is handled, please inquire with us at one of the following addresses:

Online Republic Global Headquarters
Level 5, 12 Madden Street,
Auckland, New Zealand
E-Mail: personaldata@onlinerepublic.com

Online Republic Australia Headquarters
Suite 3.02, 11 Queens Rd,
Melbourne VIC 3004, Australia
E-Mail: personaldata@onlinerepublic.com

Online Republic China Headquarters
Unit A6, Art U Place community No.68 Huan Mei Rd, Da Mei Sha Yan Tian District,
Shen Zhen City, China
E-Mail: personaldata@onlinerepublic.com

Online Republic United Kingdom Headquarters
13 Beechwood Close, Hailsham,
East Sussex BN27 3TX, United Kingdom
E-Mail: personaldata@onlinerepublic.com

Online Republic Germany Headquarters
Prinzregentenstraße 54,
80538 München, Germany
E-Mail: personaldata@onlinerepublic.com

Online Republic Philippines Headquarters
Two ECom Center, Tower B, Pasay,
Metro Manila, Philippines
E-Mail: personaldata@onlinerepublic.com



Additional Protection Provisions

EU Data Protection Provisions

The following applies to you if:

- you are based in the UK or the European Economic Area (EEA), and
- Online Republic acts as a controller in the processing of your personal data.

In case of any inconsistencies between these provisions and the rest of this Policy, these provisions prevail.

Legal basis for processing

We collect and process information about you only where we have legal bases for doing so under applicable laws. The legal bases depend on the Services you use and how you use them. The following legal grounds apply to our processing of your personal data:

- **Contractual performance:** it is necessary for us to collect and handle your personal information in order to provide you with Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services.
- **Legitimate interests:** the processing of your personal information satisfies a legitimate interest of Online Republic and our reason for using it outweighs any prejudice to your data protection rights.
- **Legal obligation:** the processing of your personal information is required for us to comply with our legal obligations.
- **Vital interests:** where we need to use or process your personal information in order to protect you or somebody else who requires urgent assistance.
- **Consent:** You give us consent to process your Personal Information for a specific purpose.

In limited circumstances we may collect special category or sensitive information. This includes information concerning health, racial or ethnic origin, political opinions, religious beliefs, trade union membership or sexual orientation. Our legal grounds for collecting special category or sensitive information include;

- **Legal obligation:** the processing of your personal information is required for us to comply with our legal obligations.
- **Vital interest:** where we need to process your information in order to protect the vital interests of you or another person where you or the other person are legally incapable of giving consent.
- **Legal claims:** where your personal information is necessary for us to establish, exercise or defend any legal claims.

Where none of the above legal grounds apply, we will obtain your consent to our use of your personal information. **You may withdraw that consent at any time.**

Individual rights

In addition to the rights already described in this policy, you have the right:

- To request that our processing of your personal information be restricted;
- To object to our use of your personal information (including for marketing purposes);
- To request the deletion or restriction of your personal information; and
- To request your personal information in a structured, electronic format (as described in [Data Portability below](#)).

You can exercise some of these rights by logging into the Services and using settings available within the Services or your account. For all other requests, you may contact us as provided in the [Contact](#) section above or by contacting the Data Protection Officer as provided below.



When you make such requests, we will respond within 30 days of receipt. If there is delay or dispute as to whether we have the right to continue using your personal information, we will restrict any further use of your information until the request is honoured or the dispute is resolved.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we are permitted by law or have compelling legitimate interests to keep.

If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed. Details on how to contact your local data protection authority are provided below.

Data portability: Data portability is the ability to obtain some of your personal information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). This right applies to your personal information which has been processed by us on the basis of contractual performance or consent (as described above). Where applicable and, if requested, we will provide you or a controller as identified by you with an electronic file of that information.

Disclosure of information outside the EEA

When disclosing information outside of the EEA (or the UK for UK data subjects) we will take specific measures under the relevant circumstances, as informed by relevant legislation, in order to protect your personal information. There are certain countries outside of the EEA that have been approved by the European Commission as providing essentially equivalent protections to your data and personal information as the EEA data protection laws. We rely on these approvals (or adequacy decisions) from time to time, including transfers to New Zealand and to US based organizations who are certified as compliant with the EU US Privacy Shield.

In dealing with countries which have not been approved by the European Commission, we will take the appropriate measures to protect your personal information. These measures may include the EU Commission-approved model contractual clauses or binding corporate rules permitted by applicable legal requirements.

Data Protection Officer (DPO)

We have appointed a Data Protection Officer (DPO) to help ensure that we meet our obligations under relevant data protection laws. If you have any queries, questions, concerns or wish to make a complaint regarding how we deal with your personal information you may contact the DPO, using the following details:

Data Protection Officer

Level 2, 509 St Kilda Road, Melbourne, VIC 3004

Email: personaldata@onlinerepublic.com

Complaint to the Data Protection Authority

If you have any concerns or complaints about how we are collecting or processing your Personal Information, you can complain to 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



California Consumer Protection Provisions

The following provisions apply to you if you are a California resident. In case of any inconsistencies between these provisions and the rest of this Policy, these provisions prevail.

Right to deletion

You can request the deletion of your personal information. Subject to the exceptions to the right to delete, and verification of the request, we will delete your information in accordance with your request.

For all requests, you may contact us as provided in the [Contact](#) section above or via the following to request assistance:

US toll-free telephone number: +1 8009615716
personaldata@onlinerepublic.com

People's Republic of China Provisions

These provisions ("China Addendum") apply only if you are located in the People's Republic of China ("China"). In case of any inconsistencies between this China Addendum and the rest of this Policy, this China Addendum prevails. For the purposes of this China Addendum, the People's Republic of China does not include Hong Kong SAR or Taiwan.

Sensitive Personal Information

Your telephone number, national identification card number, email address, data regarding your physical and/or mental health, sexual orientation, religious or similar beliefs and certain information about your use of our Technology IT Systems, such as your location, web-page browsing history, content and record of your communications, may be considered as sensitive personal information in accordance with applicable Chinese law and regulations. We will only use it for the purposes as stated in this policy and will take measures to ensure its security.

Sale of business

We may transfer any personal information when we sell or transfer all or a portion of our business or assets to a third party such as in the event of merger, acquisition, liquidation or similar event. We will require such third party to continue to comply with this policy including this China Addendum or require such third party to obtain your consent again.

Notifications

We cannot absolutely guarantee the security of any information or data you provide online. In the event of a serious security incident, we will notify you and report to competent regulators in China as required by applicable law.

Closure of a registered account.

If you want to close an account which is registered with us, you can log into the Services and using settings available within the Services or your account or contact us as provided in the [Contact](#) section above.

Last updated 13 November 2019

