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# Lennetään Travel | Privacy Policy

**Effective Date:** 17 September 2025

## 1. Introduction

At Lennetään Travel (“we,” “our,” or “us”), we respect your privacy and are committed to protecting your personal data. This Privacy Policy explains how we collect, use, store, and share your personal information when you engage with our services, including through our website [www.lennetaan.travel](http://www.lennetaan.travel).

### Our contact details:

**Email:** [contact@lennetaan.travel](mailto:contact@lennetaan.travel)

**Phone:** 1800 979 738 (Australia) and 020 4542 9852 (United Kingdom)

**Address:** G, 470 St Kilda Road, Melbourne 3004, Victoria, Australia, and 71-75 Shelton Street, Covent Garden, London WC2H 9JQ, United Kingdom

This Privacy Policy forms part of our Terms and Conditions and applies to all users of our services.

## 2. Purpose

This Privacy Policy is designed to give you transparency and control over your personal data. It explains:

- What personal data we collect;
- How we use it;
- Who we may share it with;
- Your rights regarding your personal data;
- Our use of cookies and tracking technologies;

Legal bases for processing personal data (where applicable).

## 3. Legal Basis for Processing Personal Data

We comply with Australian privacy law (Privacy Act 1988) and, where applicable, the UK GDPR. We only process personal data when there is a valid legal basis:

- Consent – e.g., subscribing to newsletters or marketing communications.
- Contractual Necessity – to fulfil bookings or provide travel services.
- Legitimate Interests – to improve services, prevent fraud, or protect legal rights.
- Legal Obligations – when processing is required by law.

## 4. Personal Data We Collect

We collect only the personal data necessary for our services.

### 4.1 Data Collected Automatically

When you visit our website, we may collect:

- IP address;
- Browser type and version;
- Time zone settings;
- Operating system;
- Referring URL;
- Pages visited and interactions (for analytics).

### 4.2 Data Collected Directly

When you interact with our services, we may collect:

- Name;
- Email address;
- Mailing address;
- Phone number;
- Payment details (processed and stored securely by Stripe);
- Passport or identification information (if required for travel bookings).

#### Collection methods:

- Booking forms;
- Newsletter subscriptions;
- Customer support enquiries.

## **5. How We Use Personal Data**

We use personal data for purposes including:

- Creating and managing travel bookings;
- Providing customer support;
- Processing payments and refunds;
- Sending marketing communications (only with consent);
- Complying with legal obligations;
- Analysing and improving our services.

We do not use your data beyond these purposes without your explicit consent.

## **6. Who We Share Personal Data With**

We may share personal data in the following situations:

### **6.1 Employees**

Authorised employees may access personal data to perform their duties.

### **6.2 Service Providers**

We share personal data with third-party providers necessary to deliver our services, including:

- **Bokun** – booking integration;
- **Stripe** – payment processing;
- Other travel providers solely for booking purposes - demographic information only.

All providers are bound by confidentiality and data protection agreements.

### **6.3 Legal Disclosures**

We may disclose data to:

- Comply with legal obligations or regulatory requests;
- Protect our legal rights or in litigation;
- Potential buyers in the event of a business sale.

We do not sell your personal data.

## **7. Data Transfers**

All data is stored either in Australia or by approved third-party providers. We do not transfer personal data outside of Australia or the UK unless required for bookings, in which case safeguards are implemented (e.g., Standard Contractual Clauses for GDPR compliance).

## **8. Data Retention**

We retain personal data for five years or as required by law, accounting, or reporting obligations. If longer retention is necessary, we will notify you.

## **9. Data Security**

We take reasonable steps to protect your personal data, including:

- Encryption of sensitive information;
- Restricted access to authorised personnel;
- Regular audits of data security protocols;
- Secure storage systems.

No system is completely secure, and we cannot guarantee absolute protection.

## 10. Your Rights

Depending on your location, you may have the following rights:

- Access: Request access to your personal data;
- Correction: Correct inaccurate or incomplete data;
- Deletion: Request deletion of personal data;
- Restriction: Request limited processing;
- Data Portability: Request transfer of data to another service;
- Objection: Object to processing for legitimate interests or marketing;
- Withdraw Consent: Withdraw previously given consent.

To exercise your rights, contact our Legal Officer:

**Email:** [legal@lennetaan.travel](mailto:legal@lennetaan.travel)

**Phone:** 1800 979 738 (Australia) and 020 4542 9852 (United Kingdom)

You may also lodge a complaint with the OAIC (Australia) or the UK Information Commissioner's Office (ICO).

## 11. Cookies and Tracking

We use cookies to improve your experience and understand website usage.

### Types of cookies:

- Functional cookies: Save your preferences;
- Analytical cookies: Track usage to optimise services.

You may disable cookies via your browser settings, but this may affect website functionality.

## 12. Automated Decision-Making

We do not use personal data for automated decision-making or profiling. Any personalisation of mystery trips is based on information you provide voluntarily.

## 13. Changes to This Policy

We may update this Privacy Policy to comply with legal requirements or improve our practices. If you wish to be notified of any Privacy Policy changes, please contact our Legal Officer.

## 14. Contact Information

For any questions, concerns, or complaints:

**Email:** [legal@lennetaan.travel](mailto:legal@lennetaan.travel)

**Phone:** 1800 979 738 (Australia) and 020 4542 9852 (United Kingdom)

**Website:** [www.lennetaan.travel/legal](http://www.lennetaan.travel/legal)

## 15. Trading and Business Number

**Australia:** Lennetaan Travel, trading for Phillip Broederlow, ABN 34 564 381 016

**United Kingdom:** Lennetaan Travel Ltd, Company Number 16409109