

# Air Niugini Privacy & Security of Information Statement

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Back to TopIntroductionFrom 21 December 2001, Air Niugini Ltd and its related companies (collectively referred to as "we", "us" and "Air Niugini") will be subject to the National Privacy Principles under the Privacy Act 1988 (Cth) (as amended by the Privacy Amendment (Private Sector) Act 2000 (Cth)). This Privacy Statement explains in general terms how Air Niugini protects the privacy of your personal information under the National Privacy Principles. It will apply to any personal information you provide to us:

- when making a booking with us, checking-in for a flight or lodging freight;
- under any other agreement or arrangementThis Privacy Statement will also apply to any information about you that is provided to us by someone else such as a travel agent. This Privacy Statement does not apply to Air Niugini employee records, which are generally exempt from the legislation.Back to TopWhat information do we collect?The types of personal information that we collect from you will depend on the circumstances of collection and on the type of service you request from us. For example, when you request us to make your travel arrangements, we may collect details such as your name, address, flight and other travel details, credit/debit card number and expiry date, billing address, telephone numbers, Executive Club number or other loyalty program membership details, dietary requirements (if any) and health issues relevant to your travel arrangements. As we are required by law to obtain your consent to the collection of "sensitive information" we will assume that you have consented to the collection of all information, which is provided to us for use in accordance with this Statement, unless you tell us otherwise.Back to TopHow we collect informationWe may collect personal information about you when you deal with us over the telephone, send us correspondence (whether by letter, fax or email), visit our web sites or when you have contact with us in person. As well as collecting information directly from you, there may be occasions when we collect information about you from a third party. For example:
  - from people making travel or freight bookings on your behalf;
  - from third party telesales companies that collect your personal information and disclose it to us so that we may issue you with your ticket and make and fulfil your travel arrangements or market our products and services to you;
  - other service providers who collect information on our behalf such as operators of our online booking engine, our Executive Club programme and corporate travel functions;
  - from market research companies contracted by us to obtain information so that we may improve and market our products and services;
  - from third party service providers and Executive Club Partners that collect your personal information when providing you with a service and disclose it to us so that we may award you with Executive Club membership entitlements;
  - from other organisations that issue an Air Niugini Air Waybill on our behalf for the carriage of your freight.Back to TopHow we use your personal information

We generally collect your personal information for the following purposes:

- to process your travel and freight arrangements and other transactions;
- to facilitate your participation in the loyalty programs of Air Niugini and other organisations;
- to conduct marketing activities and to conduct market research; andsome of the personal information we collect is essential for us to be able to accurately identify who is using the service. Other types of personal information we collect help us to profile who is using our services and what their interests are.Back to TopDisclosure of personal information to third partiesWe may disclose your personal information to third parties, for example, to our contractors to whom we contract out certain services and Executive Club Service Partners participating in the program for use in the operation and marketing of those programs, other carriers, travel and freight service providers, data processing companies (including operators of global distribution systems and payment clearing houses) for the purpose for which the information was collected or for related purposes, for example to complete a transaction on your behalf or provide you with a service that you requested. We may also disclose your personal information to various law enforcement agencies and governments around the world for security, customs and immigration purposes. Your information will also be shared between related Air Niugini companies where necessary to fulfil our purposes. We engage third party contractors to perform services for us which involves the contractor handling personal information we hold. For example, we currently engage third party contractors to:
  - provide email and mail handling services;
  - provide electronic funds transfer services, credit card account processing and related services;

- operate call centres;
- operate some corporate travel sales and fulfilment functions;
- conduct market research;
- provide catering services;
- provide ground handling services, such as check-in agents, freight handling and special assistance;
- assist with obtaining payment from creditors;

In these situations, we prohibit the third party contractor from using personal information about you except for the specific purpose for which we supply it. Other than the above, we will not disclose your personal information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.

**Back to Top** Access to and correction of information we hold about you We will, on request, provide you with access to the information we hold about you, unless there is an exception, which applies under the National Privacy Principles, including for the purpose of correcting or updating that information. We may recover from you our reasonable costs of supplying you with access to this information. Your request to provide access to this information will be dealt with in a reasonable time. If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the National Privacy Principles. In light of the new legislation we are putting in place systems and procedures to facilitate access to all information we hold about you on request. For information which we collected prior to 21 December 2001, we may not be able to provide you with access to this information where to do so would place an unreasonable administrative burden on us or cause us unreasonable expense.

**Back to Top** Keeping your personal information up-to-date We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

**Back to Top** Transfer of information overseas We may transfer to people in foreign countries any of your personal information to fulfil the purposes set out in this Privacy Statement, for example:

- to Air Niugini offices overseas;
- to data processors (including operators of global travel distribution systems); and
- airlines, hotels and other travel and freight service providers.

In most cases the transfer will be necessary for the performance of our contract with you or for the implementation of pre-contractual measures taken in response to a request by you or for the performance of a contract with a third party which is concluded in your interests. Please let us know if you have any objections to such transfers.

**Back to Top** Executive Club Additional information is collected by us through your registration with, and participation in, the Executive Club program. This includes information such as country of residence, gender, name of employer and position in company, email address, date of birth, mother's maiden name (for security purposes), credit card details, home address, business address, other address, business fax number, seating and other travel preferences and leisure and sports interests. Information on our Executive Club databases is used for additional purposes which members consent to as part of the terms and conditions of membership. One of the primary purposes of these programs is the conduct of marketing activities. Other purposes include Air Niugini improving its customer service, including by means of research, marketing, product development and planning and; Air Niugini marketing its products or services or the products and services of its partners. Air Niugini discloses information to Frequent Flyer partner Airlines, Executive Club program partners and any other person (including without limitation a related body corporate, agent or contractor) for these purposes and to any third party providing services to Air Niugini and members in connection with the administration of the Executive Club program. Membership of and participation in the Executive Club Program is subject to the program terms and conditions which are available from Air Niugini upon request. The program terms and conditions include consent by members to their information being transferred to or from Australia for these purposes. Some of the information is deemed mandatory for participation. Members are advised that if all or any of the non-mandatory information is not provided, the services provided by Air Niugini may be affected.

**Executive Club program members can update their profile information by contacting their nearest Air Niugini Travel Centre.**

**Back to Top** Resolving your concerns If you wish to gain access to your personal information, have a complaint about a breach of your privacy or you have any query on how your personal information is collected or used please forward your request, complaint or query to the address below. We will respond to your query or complaint as soon as possible.

**Back to Top** Changes to this Privacy Statement We may amend this Privacy Statement as our business requirements or the law changes. Any changes to this Privacy Statement will be updated on our website, so please visit -- [airniugini.com.pg](http://airniugini.com.pg) -- periodically to ensure that you have our most current privacy statement.

**Back to Top** Our contact details - passenger & freight enquiries Air Niugini Ltd P.O.Box 7186, Boroko Air Niugini House Port Moresby, National Capital District Jackson's Airport Or Papua New Guinea Port Moresby Ph: +675 327 3200 Papua New Guinea Fax: +675 327 3550 [mailto:ang@\[airniugini.com.pg](mailto:ang@[airniugini.com.pg) **Back to Top**