

HM Consolidated Pty Ltd

Privacy Policy

HM Consolidated Pty Ltd, which wholly owns Aviair Pty Ltd (trading as Aviair and Nexus Airlines), Freshwater Quality Management Pty Ltd (trading at Bungle Bungle Savannah Lodge, Freshwater East Kimberley Apartments, the Pumphouse Restaurant), Helicopter Film Services Pty Ltd (trading as HeliSpirit), Kimberley Cultural Tours Pty Ltd (trading as Bungle Bungle Guided Tours), Northern Experiences Pty Ltd (trading as Kimberley Experiences), Australian Helicopter Academy Pty Ltd and Infinity Operations Pty Ltd (“we” / “us”/ “our”) takes their obligations to protect personal information seriously. We are bound by Privacy Act 1988 (Cth) and the Australian Privacy Principles (“APP”) (together, “the Privacy Act”).

About this Privacy Policy

The purpose of this Privacy Policy is to tell you how we manage your personal information.

This includes:

- the kind of personal information that we collect and hold about you;
- how we collect your personal information;
- how we hold your personal information;
- the purposes for collecting, holding, using and disclosing your personal information;
- how you may access your personal information held by us and correct that information where it is incorrect;
- how you may make a complaint about the way we collect, hold, use or disclose personal information, and how we will deal with Privacy related complaints; and
- whether we will (or are likely to) disclose your personal information to overseas recipients and the countries where such recipients may be located.

This Policy applies to any individual no matter how they interact with us (e.g. on-line, in person or over the phone) or in what capacity they interact with us (e.g. as an individual, representing another person or representing a company).

We will usually be able to interact with an individual anonymously or using a pseudonym if the interaction is general in nature, however, if the interaction is more specific, we will need to identify the individual.

This Policy will be kept up to date and published on our websites.

Types of Personal Information We Collect and Retain

We offer a wide range of products and services and we may collect and hold a range of personal information about you. We are likely to collect information about many types of individuals such as customers and prospective customers, employees, contractors, prospective employees and contractors, suppliers, agents, service providers and the people who represent the businesses we deal with.

The type of personal information we collect and hold may vary depending on the nature of our interactions with the individual and our relationship with them. This information can include financial information, credit related information, identification information, banking details and employment information. We will collect and hold name and contact information of all the individuals that we deal with.

In order to satisfy our legal obligations, we may need to retain your information after a transaction or a relationship has come to an end; however we will not retain your identifiable personal information longer than is reasonably necessary and allowable under Australian law.

Some elements of personal information are also referred to in the APP as sensitive information, for example, health information. We will only collect sensitive information with your consent or when permissible under Australian law and we will only use this information for a legitimate purpose where this is reasonably necessary.

How We Collect Your Personal Information

Wherever it is possible and practical to do so, we will collect personal information directly from you, this will largely be through bookings and sales enquiries, may be

in person, over the telephone, by mail, over the internet, by e-mail or fax, or by completion of a sales-related form, for example in running a competition or promotion.

We may also collect your personal information from a third party such as a client, contracted party or promotional and sales partner. The type of third party who might provide information to us will vary depending on the nature of the business and interaction with you.

Whilst this is not an exhaustive list, we may obtain your personal information from the following sorts of third parties:

- an authorised representative (e.g. accountant, solicitor or other person acting on an individual's behalf);
- another employee of an organisation (e.g. if a person representing a business we deal with wants us to interact with another individual within that business);
- a referee (for job applicants);
- a recruitment consultant (for job applicants);
- a licenced credit reference agency; and
- one or more of our related companies here or overseas.

How We Hold Your Personal Information

We understand the importance of protecting the personal information we hold about you. Given this we are focused on protecting your personal information from misuse, interference, loss, unauthorised access or modification by:

- securing all personal information;
- limiting access to personal information to those that need access; and
- protecting our systems with appropriate technology and security solutions.

The Purposes for Collecting, Holding, Using and Disclosing Your Personal Information

We collect, hold, use and disclose your personal information in order to interact with you. This includes managing and administering the products and or services we provide to our customers whether they are individuals or businesses. You may be a customer, contractor, job applicant, supplier, partner or party with whom we do or

have done business, or may do business in the future. You may be acting on your own behalf of as a representative of a company or business.

Marketing and Events

Your personal information may also be used or disclosed in the course of us advising you, or the business that you represent, of products and services that may be of interest to you or that business or in inviting you or others to attend events organised by us. By purchasing a product or enquiring to purchase a product from us you consent to us sending you commercial electronic messages to assist us deliver our service to you, to assist us to undertake market research and deliver product updates, and to deliver messages that we believe may be of interest to you.

You may unsubscribe to our communications to you at any time by clicking on the unsubscribe link provided on communications from us.

If you do not want your personal information to be used for these purposes, you should tell us so that we can action this request. We may be contacted for this purpose at: privacy@hmconsolidated.com.au

How You Can Access and Correct Your Personal Information Held by Us

You are entitled to access the information we hold about you. Simple requests are best handled by speaking to the person you usually contact when dealing with us. More complex request may be better detailed in writing to ensure we fully understand and are able to respond accurately to the requests.

Contact method: privacy@hmconsolidated.com.au

If for any reason we are unable to agree to a request for access to your personal information we will advise this in writing. Some examples of why we may refuse a request for access include, where providing the information:

- may pose a threat to the health or safety of an individual or the public;
- may have an unreasonable impact on the privacy of another individual;
- is not allowed by law; or
- may reveal internal information relating to a commercially sensitive decision making process.

If information we hold about you is incorrect, we would like to know so that we can promptly correct this. To do this please contact us in the manner indicated above.

In certain situations, we may not agree to a request to correct information we hold about you, if this occurs, we will advise of this and our reason for not agreeing to the correction request.

How to Lodge a Privacy Complaint and Our Complaint Resolution Process

If an individual wants to make a complaint about our handling of personal information, they should provide details of the complaint using the contact information below:

privacy@hmconsolidated.com.au

If the complaint is not resolved it may be referred to the Office of the Australian Information Commissioner (the “OAIC”) the contact details for the OAIC are:

The Office of the Australian Information Commissioner
GPO Box 2999
Canberra ACT 2601
Australia
Phone: 1300 363 992
Fax: 02 9284 9666
Web site: www.oaic.gov.au

Parties to Whom We May Disclose Personal Information

From time to time, we share personal information within our related bodies corporates, as defined in the Corporations Act 2001 (Cth). We require all these businesses to comply with strict confidentiality requirements and the APP.

Circumstances for Disclosing Personal Information to Overseas Recipients and Their Locations

Some of our related bodies corporate do business with organisations located overseas and technology allows for services to be provided to us by different service providers including some that are located overseas, and we do utilise overseas service providers. It is not practicable to list every country in which recipients are located; however, it is likely that the countries to which your information will be disclosed may include the United States of America, Canada, United Kingdom and Singapore.

Web Tracking Information

For statistical purposes, we collect information on web site activity such as the number of users who visit our web sites, the date and time of visits, the number of pages viewed, navigation patterns, what country and what systems users have used to access the site and, when entering one of our web sites from another web site, the address of that web site. This information is obtained using ‘cookies’ (refer below for more information about “cookies”).

Our web sites may also contain links to web sites for our related bodies corporate. While these links are provided for convenience, if you are navigating to these sites, please be aware that the information handling practices of the linked web sites may differ from ours. While we try to link only to sites that share our high standards and

respect for privacy, we are not able to guarantee the privacy practices of other web sites.

For statistical purposes, we collect information following the dispatch of a mass market communication in the form of an email such as the number of times the email has been opened, which hyperlinks within an email have been opened, whether a person has chosen to unsubscribe to receiving emails from us, and whether an email has been forwarded to another email address. This information is obtained using 'cookies' (refer below for more information about "cookies").

Website Security

Whenever personal information is sent via our web site we use high security levels to protect it. The security level of a web page can be viewed by clicking on the internet browser's padlock or key icon.

Cookies

A 'cookie' is a packet of information that allows a web site to identify and interact more effectively with a computer. Cookies do not identify you, although they do identify your browser type and Internet Service Provider.

Your browser can be individually set to accept all cookies, reject all cookies, or notify when a cookie is sent. If cookies are rejected, there may be limits on how our web sites can be used. To evaluate the effectiveness of our web site advertising, we may use third parties to collect statistical data. No personal data is collected on these occasions.

Website Advertisements

From time to time, we place cross-advertisements of our related bodies corporate's businesses on the websites of each of our related bodies corporate. This may involve installing a cookie on a computer when our advertisement is viewed. These cookies will not contain any information that personally identifies an individual (such as a name or e-mail address). This simply allows us to keep track of how many unique visitors we have to our site and from what advertisements they entered. This then allows us to measure the effectiveness of different advertisements. The privacy policies of the web sites which install the cookies should provide additional information about the use of cookies. It is important to remember that a browser can be set to reject cookies.

