

Paspaley Privacy Policy – Pearl Expedition Cruises

20 June 2025

1 Introduction

Pearl Expeditions Pty Ltd (ACN 685 395 493) (**we, us** and **our**) understands that your privacy is paramount. We take the privacy of our customers very seriously and are committed to protecting your privacy. This policy sets out how we handle information about you.

2 Collection of personal information

We may collect personal information from you when you:

- visit our website or social media pages;
- make a travel reservation with us;
- travel as a guest on our vessels (whether for a cruise operated by us, or another organisation chartering the vessel), including when you select optional or paid services (such as excursions), or request assistance, when travelling with us;
- enter a competition or promotion we conduct;
- subscribe to any of our communications;
- make an enquiry with us;
- provide feedback to us; and/or
- contact us by any method, such as telephone, email, post or in person,

or otherwise as notified to you from time to time, including through a collection statement.

When you travel on a cruise operated by us, we will collect the personal information provided to us during the reservation process or in connection with your trip. Such personal information may include your name, contact details, credit card details, identification and travel documents such as drivers licence and/or passport details, travel information such as connecting flights and transfers, dietary information, details of your emergency contacts, health information in case issues arise while you are travelling with us, and information about your preferences and feedback.

When you travel on a cruise operated by another organisation chartering our vessel, that service provider may use our IT systems and staff for the operation of that cruise, and we may collect similar information about you as a result.

There may be occasions when we collect information about you from a third party, for example via travelling companions (such as family or friends) or travel agent who may make a reservation on your behalf. In such instances, we will determine whether we would have been entitled to collect such information from you and to the extent we would not have been entitled to do so, we will destroy or de-identify such information as soon as reasonably practical.

You may deal with us anonymously or using a pseudonym, but only for limited interactions. For example, if you contact us via phone with a general enquiry, we will not ask for your full name unless we need it to adequately handle your enquiry. However, if you travel with us (including making a reservation), we require that you provide us with accurate personal information. If you do not provide us with your personal information, you will not be able to travel with us.

3 Our websites

Our web servers may automatically collect information when you visit our websites, including:

- your IP address;
- the date and time of your visit;
- the parts of our website you access during your visit;
- your actions on our website;
- the browser you are using, and
- where you make or manage a reservation through our website, this information may be associated with you.

In using our website, your personal information may be collected through the use of cookies. These are small text files placed on your mobile device or computer by our website which automatically collects information about you without you providing that information to us directly. Most browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies.

Please note that rejecting cookies may mean that some or all of the functions on our websites will not be available to you. In particular, cookies must be enabled to access and use any part of our websites for placing orders.

Sometimes our websites contain links to other websites. When you access a website other than our website, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

4 Using your personal information

In this privacy policy, “use” means to collect, hold, use and disclose.

We use personal information for the purpose for which it was collected, for related purposes which we consider come within your personal expectations, or as permitted or required by law.

In particular, the personal information that we collect is generally used to provide goods or services to you, including to:

- provide our cruises to you (or to the organisation who has chartered our vessels, where that is the case). This includes providing optional or paid services (such as excursions);
- to communicate with you about your cruise or customer service needs;
- to respond to your questions or suggestions;
- to improve the quality of our goods or services; or
- as notified to you at the time the information is collected.

We may contact you from time to time for marketing or promotional purposes, including to provide you with information in relation to the goods or services of our related entities and third parties where we believe they meet the high standards associated with our products. If you would rather not receive any marketing or promotional material from us, you may opt out by notifying us using the contact details in section 9 below, or following the unsubscribe instructions on any marketing email you have received.

5 Sharing your personal information

We may disclose your personal information to other related entities within our corporate group for the group's business purposes. Some of our related entities are located overseas, including in Hong Kong, Japan and the United States of America.

We may disclose information to third parties, who:

- you or we may interact with in connection with your cruise, such as your travel agent or (where we consider reasonably appropriate) travelling companions such as family or friends, relevant government bodies including immigration officials, transfer operators, and providers of excursions you choose to participate in; or
- help us deliver our products and services to you, for example, by processing and analysing data, providing IT support, and delivering products or information to you.

Some of these third parties are located overseas. However, due to circumstances which change from time to time (including variations in the countries that our vessels may visit), it is not practicable for us to specify the countries in which these third parties are located.

While we may market the goods or services of third parties in limited circumstances as described above, we will always do so ourselves (or using our own third-party contractors). We do not sell, rent or trade personal information to third parties for marketing purposes.

We may also disclose your personal information as permitted or required by law.

6 Accessing your personal information

You may contact us to request access to the information we hold about you, including for the purpose of correcting or updating that information. If you wish to do so, please contact our Privacy Manager as described in section 9 below.

7 Protecting your personal information

We are committed to protecting your personal information. We implement security measures to hold and protect your personal information from misuse, interference or loss, and from unauthorised access, modification or disclosure. This includes the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of your personal information.

8 Change of policy

We may modify or amend this Privacy Policy from time to time. We will, for a reasonable period after any such revisions have been made, display a notice on our website accordingly. We will keep the current version of this Privacy Policy on our website.

9 Contact information

If you have any queries or complaints with regards to our collection, use or management of your personal information, please contact our Privacy Manager:

A: Privacy Manager
Charles Darwin Centre
Level 20
19 The Mall
Darwin NT 0800
E: privacy@paspaley.com.au

T: (08) 8982 5555

If you make a complaint, we will endeavour to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at enquiries@oaic.gov.au.