

JETPAX

Bespoke. Exclusive. Private.

Privacy Policy

PRIVACY ACT 1988 (CTH) · AUSTRALIAN PRIVACY PRINCIPLES

ISSUED BY	JETPAX Pty Ltd
ABN / ACN	52 642 967 566 / 642 967 566
DOCUMENT	Privacy Policy
VERSION	1.0
EFFECTIVE DATE	23 June 2026
REGISTERED OFFICE	Level 2, Kings Row 2, 50 McDougall Street, Milton, Queensland 4064
GOVERNING LAW	Queensland, Australia

This Privacy Policy describes how **JETPAX Pty Ltd** (ABN 52 642 967 566), trading as **JETPAX**, collects, holds, uses, discloses and protects personal information. JETPAX is bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (**APPs**). Where JETPAX handles the personal data of individuals in the European Union or United Kingdom, the additional protections in clause 12 apply.

1 Who we are

1.1 JETPAX is the entity responsible for personal information collected through its website, communications and services. For the purposes of the Privacy Act 1988 (Cth), JETPAX is an APP entity. Where the EU or UK General Data Protection Regulation (**GDPR**) applies, JETPAX is the data controller.

2 Information we collect

Depending on the Client's dealings with us, we may collect:

- Identity and contact information** — name, date of birth, nationality, passport and identity-document details, address, email and telephone.
- Travel information** — passenger manifests, itineraries, preferences, and dietary or accessibility requirements.
- Financial information** — billing and payment details and, where required, source-of-funds and beneficial-ownership information.

- (d) **Commercial information** — enquiries, quotes, bookings and correspondence.
- (e) **Technical information** — IP address, device and browser information, and usage data collected by cookies.

2.1 Some information — such as health, dietary or accessibility requirements — is "sensitive information" under the Privacy Act. We collect it only with consent and only to arrange travel safely and to requirements.

3 How we collect it

3.1 We collect personal information directly from the individual, from their authorised representatives, from third parties such as Operators, suppliers, identity-verification and sanctions-screening providers, and from publicly available sources. Where an individual provides information about other passengers, that individual confirms they are authorised to do so and that those passengers are aware of this Policy.

4 Why we use it

We use personal information to: respond to enquiries and provide quotes; arrange and deliver charter and related services; pass necessary passenger and trip details to Operators and suppliers; conduct identity, anti-money-laundering and sanctions checks required by law; process payments and maintain accounts; comply with legal, regulatory and aviation-security obligations; maintain and improve our services and website; and, where permitted, send service and marketing communications.

4.1 Where the GDPR applies, our lawful bases are performance of a contract, compliance with a legal obligation, consent (which may be withdrawn), and our legitimate interests in operating and improving our business.

5 Disclosure

We disclose personal information to: Operators and suppliers, to deliver a trip; service providers acting on our behalf (payment, screening, IT, communications and CRM); regulators and authorities where required by law; professional advisers where reasonably necessary; and a purchaser in connection with a sale or restructure of our business, subject to confidentiality. **We do not sell personal information.**

6 Cross-border disclosure

6.1 JETPAX operates across Australia and the United Arab Emirates and engages Operators and suppliers internationally. Personal information may therefore be disclosed to, or accessed from, recipients outside Australia, including in the UAE, the European Union and other countries where a trip requires it.

6.2 Before disclosing personal information overseas, we take reasonable steps under APP 8 to ensure the recipient handles it consistently with the APPs, or we rely on an applicable exception. Where the GDPR applies, international transfers are made under an appropriate safeguard, such as an adequacy decision or standard contractual clauses.

7 Marketing

- 7.1** Where permitted, we may send information about our services. We comply with the Spam Act 2003 (Cth). Every commercial electronic message contains an unsubscribe facility, and an individual may opt out at any time by contacting [PRIVACY CONTACT EMAIL].

8 Security and retention

- 8.1** We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure, including access controls, encryption in transit and supplier due diligence.
- 8.2** We retain personal information only as long as necessary for the purposes for which it was collected or as required by law, after which it is securely destroyed or de-identified.

9 Data breaches

- 9.1** We maintain procedures to detect and respond to data breaches. Where a breach is likely to result in serious harm, we will notify affected individuals and the Office of the Australian Information Commissioner (**OAIC**) under the Notifiable Data Breaches scheme. Where the GDPR applies, we will notify the relevant supervisory authority and, where required, affected individuals within the applicable timeframes.

10 Access and correction

- 10.1** An individual may request access to the personal information we hold about them (APP 12) and correction of information that is inaccurate, out of date or incomplete (APP 13). Requests should be made to [PRIVACY CONTACT EMAIL]. We will respond within the time required by law. There is normally no charge.

11 Complaints

- 11.1** Complaints about the handling of personal information should be directed to our Privacy Officer at [PRIVACY CONTACT EMAIL]. If an individual is not satisfied with our response, they may complain to the OAIC (oaic.gov.au) or, where the GDPR applies, to their local supervisory authority.

12 Additional rights under the GDPR

- 12.1** Where the GDPR applies, individuals also have rights to erasure, restriction, portability and to object to certain processing, and the right not to be subject to a decision based solely on automated processing that produces legal effects. JETPAX does not make such automated decisions about individuals.

13 Changes

- 13.1** We may update this Policy from time to time. The current version is published on our website with the effective date shown above.

UAE / ADGM. When the JETPAX operating entity is established in the Abu Dhabi Global Market, the ADGM Data Protection Regulations 2021 will also apply, and this Policy will be revised to reflect the ADGM data-controller and cross-border requirements.