**Privacy Policy**

In operating our venue, Ermington Hotel and its related entities (together, we, us, our) collect and handle personal information.

We understand the importance of protecting the privacy of an individual's personal information. This privacy policy sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and how we collect, hold, use, disclose, and otherwise manage, your personal information.

In collecting, holding, using, disclosing and otherwise managing your personal information, we are required to comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles in the Privacy Act.

We regularly review our policies and procedures regarding personal information and may therefore update and amend this privacy policy from time to time. Any updated privacy policy will be made available on our website at ermingtonhotel.com.au or can otherwise be obtained by contacting us and requesting a copy.

**Collection of personal information**

Under the Privacy Act, personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of hospitality and related services or as a result of other interactions or dealings with you, we may collect your personal information.

The kinds of personal information that we collect will vary depending on our particular interaction or dealing with you. However, generally speaking, the kinds of personal information we collect may include:

- contact and identification information such as your name, photograph, date of birth, address, telephone number and email address (for example where you make a reservation at our venue, join our mailing list or join our rewards or loyalty program);
- information regarding your transactions with us, including reservations, accommodation and ordering history, food or beverage or other dining preferences;
- where you organise or conduct an event, information regarding the event, your guests and any relevant requirements;
- payment information, such as credit card, bank account or other payment details;
- information regarding your experience at our venue (for example, as part of our guest feedback activities or where you contact us with feedback); and
- where you apply for employment with us (in addition to contact and identification information detailed above), information relevant to us considering your application for employment, including information in relation to your CV, employment history, qualifications and references.

We may also collect identification information, such as a copy of your driver licence, passport information or other recognised proof of identity card. We generally collect this information because we are required to do so by law (including payment of some gaming jackpots) and/or for venue, patron and employee security purposes. Specific information regarding the collection and

handling of this type of personal information may be available at the relevant venue.

We also collect CCTV footage at our venue, including for venue, patron and employee safety purposes. [We may additionally use facial and/or vehicle recognition technology in and around our venue, to identify you or your vehicle, or to identify certain characteristics about you, such as your gender and approximate age range. This may result in biometric templates being created and stored by us. In addition to security, we may use personal information (including biometric templates) captured via facial and vehicle recognition technology in order to improve and develop our business and the products and services we offer, including by undertaking data analytics, and in connection with any gaming self-exclusion programs or schemes operated by us.] Details of suspected or actual illegal or improper conduct (including CCTV footage relating to that conduct) may be shared with relevant law enforcement or regulatory bodies.

We may also take photographs or other images or content (such as video or audio recordings). Where we do so, we will provide as much detail as possible regarding why the photographs, images or other content are being taken and the purposes for which they are being used. By attending our venue or event, you consent to us taking such photographs, images or other content and using those photographs, images or other content, including at the venue and on our website, mobile app and social media sites.

We may also collect and hold other kinds of personal information as permitted or required by law or other kinds of personal information that we notify you of at or about the time of collection.

Generally, we do not collect sensitive information about individuals. Information about your health, racial or ethnic origin, political persuasions, criminal record and religious or philosophical beliefs are all examples of sensitive information. There may be circumstances where we need to collect your sensitive information, for example where we need to collect health information regarding your allergies or in a medical emergency or if you apply for employment with us. Other sensitive information may be captured via our use of CCTV [and facial recognition technology] to capture images of individuals. If we do collect sensitive information about you, we will only do so with your consent or where we are otherwise permitted to do so by law.

**Collection of personal information by us**

Generally, we collect your personal information directly from you. For example, [ we may collect your personal information where:

- you make a booking for, or attend, our venue or event;
- you join our mailing list, fill out a survey, enter a promotion, request services or otherwise provide us with your details;
- you stay at our accommodation(if applicable);
- you book a function at our venue;
- you sign up to or participate in our rewards or loyalty program;
- you participate in a gaming self-exclusion program or scheme which we also participate in;
- you provide feedback to us regarding your experience at our venue or your other interaction with us;
- you post information to our social media sites;
- you visit our websites or use our mobile app;
- we need to make a payment to you, for example gaming jackpots; or

- you apply for or express an interest in employment with us.

However, there may be occasions when we need to collect your personal information from someone other than you, for example from:

- our service providers or contractors (for example, where we appoint a service provider/contractor to assist with conducting an event);
- our technology providers (for example, providers of our reservation, ordering, payments or booking systems);
- an information services provider;
- a gaming self-exclusion scheme provider;
- a publicly maintained record or other publicly available sources of information including social media and similar websites; or
- a referee or previous employer where you apply for employment with us.

We may also derive new personal information about you, such as insights and opinions about your habits and preferences, by aggregating various categories of personal information which we hold about you.

**Cookies and other technical information**

We may collect statistical and other information by utilising features and technologies of your internet browser or device, including cookies and pixel tags. This information will be collected when you:

- access and use our public wifi network located at our venue;
- use our website, mobile app and any online platforms available via our website or mobile app; or
- otherwise visit our venue.

The information which we collect includes technical data, such as your IP address, the type of devices you are using to access the wifi, website or app, as applicable, device attributes, browser type, language and operating system, the location from which you have come to the site and the pages you visited and, when you visit our venue, your location within the venue.

These features and technologies do not specifically identify you, but may be combined with other information we hold in order to build a profile of you. Cookies and pixel tags may be used to send targeted advertising or promotional messages but will not be used to identify you.

You may also elect to turn off the internet browser features which allow us to collect statistical information by selecting certain options on your browser. However, this may slow down or cause certain web pages to be inaccessible to you.

**Purposes for which personal information is used**

Generally speaking, we collect and use personal information so that we can provide our hospitality and (if applicable) accommodation services, interact with you in relation to our services and venue and administer and manage our business and our venue.

Some examples of the purposes for which we collect, hold, use and disclose your personal information include to:

- take bookings for our venue or events;
- provide food, beverage and other hospitality experiences at our venue;
- manage and undertake events conducted at our venue;
- manage and administer the provision of our services and our relationship with you;
- verify your identity;
- make a payment to you, for example gaming jackpots;
- maintain venue, patron and employee safety;
- enable us to supply you with information you request from us;
- conduct promotions, competitions, giveaways and events;
- contact you to obtain your feedback regarding our products or services or to conduct other market research;
- provide you with marketing information regarding us and our venue and information about our partners (as further detailed below);
- analyse how our wifi, websites, mobile apps and other online services are being used, and to seek to improve our websites, mobile apps and other online services and provide more user friendly and customised websites, mobile apps and online services;
- administer, support and improve and develop our business and the products and services we offer, including by undertaking data analytics and related activities;
- comply with obligations imposed on us under any applicable laws; and
- consider any application you make for employment with us.

We may use your personal information for more than one of the purposes listed above depending upon the context.

In addition to the purposes listed above, we may use your personal information for other purposes which we notify you of when we collect the information and for other purposes permitted or required by law.

You are under no obligation to provide your personal information to us. However, without certain information from you, we may not be able to provide services or information to you or may be limited in how we can interact with you.

**Direct marketing**

In addition to the purposes outlined in above, we may use and disclose your personal information in order to inform you of promotions, competitions, giveaways, events, products or services that may be of interest to you. Where you make a booking at our venue or sign up for our mailing list or rewards or loyalty program, this may include sending you information about our venue and/or other venues, events and services that may be of interest to you.

In doing so, we may disclose your personal information to any related entities, or other entities that the group has a commercial relationship or arrangement with, for the purpose of the other entity contacting you for such direct marketing purposes. These communications may be sent using email, telephone, SMS, social media or other similar forms of communication.

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If you do not wish to receive such communications, you can opt-out at any time by contacting us via the contact details set out below, or through the opt-out mechanism contained in a marketing communication to you.

**Disclosure of personal information**

We disclose your personal information for the purpose for which we collect it, or another purpose which is permitted by law. This may include disclosing your personal information to:

- our related entities;
- our service providers and contractors and other third parties that provide products or services to us (including our technology service providers, data analytics service providers, bookings or reservation systems providers, event service providers, marketing agencies or other business or administration service providers);
- our auditors, tax, insurance, legal or other professional advisors;
- persons or entities considering acquiring an interest in our business or assets; or
- our insurance providers.

We may also disclose your personal information for other purposes where we notify you of the disclosure at or about the time of collecting the information, with your consent or if the disclosure is required or authorised by law. Examples of disclosure that may be required or authorised by law include disclosure to law enforcement bodies, liquor and gaming regulators or under Anti-Money Laundering and Counter-Terrorism Financing laws.

If you post information or other content to public sections of our websites or to our social media sites, you acknowledge that the information or content may be viewed by the public and/or users of the relevant website or social media site.

We may also disclose information in anonymous, aggregated form for a range of purposes, including to our business partners for marketing and other commercial purposes.

**Overseas disclosures**

Some of the parties that we disclose your personal information to may be located outside Australia, including technology service providers located in China, India and Canada. We take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the Privacy Act.

**Links to other websites**

When you access our website, mobile app or other online services we may provide, as a convenience to you, links to other websites, including sites operated by our partners, associates, or independent third parties. These links are provided as a convenience to you. Each website may have its own privacy practices, as described in that site's privacy policy. Those practices may be different than the practices described in this privacy policy, and we encourage you to read each website's privacy policy carefully before you use or submit information to that site. Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that we exercise no authority or control over that third party, and cannot and are not responsible for any information that you may submit to that site.

**Security of personal information**

We take the security and protection of the personal information we hold seriously. We take steps reasonable in the circumstances to ensure that the personal information we hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

Your personal information will be kept on databases held on servers kept in a physically and technologically secured environment, accessed only by authorised personnel or contractors. Where personal information is held in hard copy, it will be held in controlled, access restricted premises which only authorised personnel or contractors will be permitted to access.

We will destroy or de-identify personal information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

**Access and correction**

We take steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading.

In addition, under the Privacy Act, you have a right to seek access to and correction of your personal information that is collected and held by us. If at any time you would like to access or correct the personal information that we hold about you, or you would like more information on our approach to privacy, please contact us using the details below. We will grant access to the extent required or authorised by the Privacy Act or other law, and (where applicable) take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- you may have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- we request that you are reasonably specific about the information you require; and
- we may charge you a reasonable administration fee, which reflects and will not exceed the cost to us for providing access in accordance with your request.

We will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms.

If you are dissatisfied with our refusal to grant access to, or correct, your personal information, you may make a complaint using the process described below.

**Contacting us**

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact us using the following contact details:
info@ermingtonhotel.com.au

**Privacy complaints**

Please direct all privacy complaints to us using the contact details above. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and us.

We will acknowledge your complaint within 7 days of receipt and endeavour to resolve it within 30 days, unless we inform you otherwise and seek your agreement in writing.

We will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, or an extension to the time in which we will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner.