

Redcape Hotel Group Pty Ltd

PRIVACY POLICY

Date: 16 August 2022

Redcape Hotel Group Pty Ltd and its related corporations (**Redcape**) is committed to complying with all privacy laws and principles, including the principles contained in the Privacy Act 1988 (Cth) as in force from time to time and Redcape is committed to protecting personal and sensitive information from unfair and unauthorised use. Management and oversight of Redcape is outsourced to a third party manager who is an agent of Redcape and who is bound to apply and comply with the Redcape Privacy Policy. We are also committed to ensuring that our employees, and those of the third party manager, are aware of their obligations in relation to the protection of personal and sensitive information.

This policy describes:

- who we collect information from;
- the types of personal information collected and held by us;
- how this information is collected and held;
- websites, devices and cookies;
- social media;
- the purposes for which your personal information is collected, held, used and disclosed;
- how we use your personal information;
- how we store your personal information;
- when we disclose your personal information
- how to gain access to and update or correct your personal information;
- sensitive information;
- anonymity and using a pseudonym
- complaints;
- contacting us; and
- how this policy may change.

WHO DO WE COLLECT PERSONAL INFORMATION FROM?

In the course of providing our products and services Redcape may collect personal information from customers, or potential customers. This may be by way of individuals completing a form within our venues, registering for a membership program, making an enquiry or booking, filling in a field on a website, ordering goods or services online through a website or App, using an App, posting on social media or when collecting winnings from gambling including our gaming machines.

WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT?

We collect and hold a range of personal information necessary to carry out our activities and functions. The kinds of personal information that we collect and hold about you will depend upon the nature of our relationship with you. Personal information we typically collect includes:

- personal details (such as your full name, address and date of birth);
- contact details (such as your phone number and email address);
- employment details (such as your occupation); and
- images collected from our CCTV surveillance. This is the safety and security of staff and customers and images are retained in accordance with licence conditions.

HOW DO WE COLLECT AND HOLD YOUR PERSONAL INFORMATION?

If it is reasonable and practical to do so, we collect personal information directly from you. We collect that information through various means including, but not limited to phone, email, mail, application forms, CCTV networks, websites, over the bar, information systems, membership cards, face to face meetings, surveys, Apps, online booking and ordering platforms

We may also collect personal information from other people (e.g. a third party promotions operator) or independent sources. However, we will only do so where it is not reasonable and practical to collect the information from you directly.

Personal information that we collect is held in different formats, including in hard copy and electronic format.

WEBSITES, DEVICES AND COOKIES

We will collect information that has been inputted into forms and field on our website including your identity when this has been provided to us. Redcape may also use cookies. The use of cookies means that when you visit our website, we may also collect information about your visits to, browsing of, and use of the website, unless your web browser has been set to block this. The range of information that we may collect will depend on how you interact with our website. We may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used to analyse how people use our site, so that we can improve our service.

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Please be aware that Redcape is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

SOCIAL MEDIA

Redcape may wish to collect data that has been posted on publicly available social media websites, channels, forums or review platforms. This will include social media account user details, feedback, comments and photos which relate to Redcape and our venues. This information may be used by Redcape for promotions and advertising.

THE PURPOSES FOR WHICH YOUR PERSONAL INFORMATION IS COLLECTED

The general purposes for which we collect, hold, use and disclose your personal information is to identify you, and provide you with products, services, promotions, advertising and membership program changes. In addition, we do all this to provide you with a better, more bespoke experience with our products and services.

HOW WE USE YOUR PERSONAL INFORMATION?

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you or to which you have consented.

Our use of personal information includes but are not limited to:

- providing you with direct marketing information on offers, activities, events, promotions, products and services;
- securing a membership account as an account username;
- marketing products or services to you and others;
- satisfying our legal obligations including those under the laws relating to liquor, gaming or anti-money laundering(AML)/counter terrorism financing (CTF);
- helping us to improve our operations, including training our staff, systems development, development of new programs and services, undertaking planning and research and statistical analysis;
- marketing and promotional services;

- conducting reviews and analysis of offers, activities, events, promotions and services;
- help to improve our day-to-day operations including training our staff; systems development; and
- developing new programs and services; undertaking planning, research and statistical analysis.

It may be necessary to disclose your information to Redcape's third party Manager, who manages and oversees Redcape. The Manager operates under a management agreement and its use and disclosure of personal information is covered and governed by this policy. It may also be necessary for Redcape or Redcape's Manager to disclose your personal information to other third parties in order to assist us with one or more of our functions or activities.

STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

We store personal information in a variety of formats including on databases, cloud storage, in hard copy files and on personal devices including laptop computers.

The security of your personal information is of paramount importance to us. We take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

Personal information we hold that is no longer needed or required to be retained by any other laws, is destroyed in a secure manner, deleted or de-identified as appropriate.

WHEN WE DISCLOSE YOUR PERSONAL INFORMATION

We only use personal information for the purposes for which it was given to us or for purposes which are directly related to one or more of our products or services. We may disclose your personal information to government agencies from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation applies; or
- disclosure is reasonably necessary for a law enforcement related activity.

HOW TO GAIN ACCESS TO, UPDATE OR CORRECT YOUR PERSONAL INFORMATION

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection, and on an ongoing basis, we maintain and update personal information when we are advised by the individual. Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date. Alternatively, this information can be updated in the Public Communities app.

You may request access to the personal information we hold about you by contacting us.

If we do not agree to provide you with access or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision.

SENSITIVE INFORMATION

Sensitive information includes a person's race or ethnic origin, political opinions, religious beliefs, membership of a trade or professional association, sexual preferences, health records, government identifiers (such as your TFN), your nationality, country of birth, family court orders and criminal records.

It is not our normal practice for us to collect sensitive information and we would only collect sensitive information if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety or another permitted general situation.

ANONYMITY AND USING A PSEUDONYM

You have the option of dealing with us anonymously or by using a pseudonym if it is lawful and practical to do so. In some cases, however, we will generally require your contact details if you would like us to transact with you, to use our Apps or if you would like us to respond to your request to provide you with some product, service or information that you are seeking.

PRIVACY COMPLAINTS

If you wish to make a complaint about a breach by us of the Australian Privacy Principles, you may do so by providing your written complaint by email, letter, facsimile or by personal delivery to any one of our contact details as noted below.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

HOW TO CONTACT US

You can contact us about this Privacy Policy or about your personal information by:

- emailing: privacy@redcape.com.au
- calling: (02) 9719 4000
- writing: 'Privacy Officer,' PO Box 156, Cremorne Junction, NSW 2090 or by facsimile at (02) 9719 4099. If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

CHANGES TO OUR PRIVACY AND INFORMATION HANDLING PRACTICES

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website (<http://www.redcape.com.au/>) regularly for any changes.