

## Privacy Policy

In this Privacy Policy, 'us' 'we' or 'our' means Moreton Hospitality Pty Ltd (ACN 679 894 350) and our related bodies corporate. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information. We are bound by, and shall at all times comply with the Australian Privacy Principles ("APP") contained in the *Privacy Act 1988* (Cth) ("Privacy Act"). We may also be bound, from time to time, by other privacy laws and regulations from other jurisdictions around the world (including, without limitation, the EU General Data Protection Regulation ("GDPR"), and shall, to the extent required, comply with all such additional laws and regulations.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

### 1. What personal information do we collect?

We may collect the following types of personal information:

- (a) name;
- (b) mailing or street address;
- (c) email address;
- (d) telephone number and other contact details;
- (e) age or date of birth;
- (f) credit card information;
- (g) your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- (h) details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- (i) any additional information relating to you that you provide to us directly through our website (or any associated app) or indirectly through your use of our website or associated app or online presence or through other websites or accounts from which you permit us to collect information;
- (j) information you provide to us through customer surveys; or
- (k) any other personal information that may be required in order to facilitate your dealings with us.

We may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:

- (a) visit or register on our website;
- (b) register or participate in our membership or loyalty programs;
- (c) enter into competitions;

- (d) provide feedback through surveys;
- (e) make a booking or reservation;
- (f) make a purchase with us of any kind;
- (g) attend an event of ours;
- (h) communicate with us in person or through correspondence, chats, email, or when you share information with us from other social applications, services or websites;
- (i) interact with our sites, services, content and advertising; or
- (j) invest in our business or enquire as to a potential purchase in our business.

In addition, when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

## **2. Why do we collect, use and disclose personal information?**

We may collect, hold, use and disclose your personal information for the following purposes:

- (a) to enable you to access and use our services;
- (b) to operate, protect, improve and optimise our services, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- (c) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- (d) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- (e) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- (f) to manage bookings and reservations;
- (g) to administer memberships and loyalty programs;
- (h) to collect and make payments associated with our services;
- (i) to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- (j) to consider your employment application.

We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

## **3. Sensitive Information**

"Sensitive Information" is defined in section 6 of the Privacy Act, and includes (amongst other things) information about an individual's:-

- (a) racial or ethnic origin;
- (b) religious and philosophical beliefs and political affiliations;

- (c) sexual orientation and practises;
- (d) criminal record;
- (e) health status; and
- (f) biometrics.

It is very unlikely that we will need to collect Sensitive Information from you through the operation of our business or the provision of our services to you. However, if we require the collection of Sensitive Information, we will only collect it with your prior consent and will ensure that it is only used for the purpose for which it was provided, and all times strictly in accordance with the Privacy Act and all other applicable laws and regulations. We will ensure this information is stored securely and in accordance with the Privacy Act and all other applicable laws and regulations, and deleted once it is no longer required.

#### **4. Do we use your personal information for direct marketing?**

We and/or our carefully selected business partners may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (eg an unsubscribe link).

#### **5. To whom do we disclose your personal information?**

We may disclose personal information for the purposes described in this privacy policy to:

- (a) our employees and related bodies corporate;
- (b) third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our services to you);
- (c) professional advisers, dealers and agents;
- (d) payment systems operators (eg merchants receiving card payments);
- (e) our existing or potential agents, business partners or partners;
- (f) our sponsors or promoters of any competition that we conduct via our services;
- (g) anyone to whom our assets or businesses (or any part of them) are transferred;
- (h) specific third parties authorised by you to receive information held by us; and/or
- (i) other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

#### **6. Disclosure of personal information outside Australia**

It is unlikely that we will need to disclose client personal information to an overseas recipient or otherwise store client personal information overseas. If we are ever required to do so, we will obtain your informed consent or ensure that the overseas recipients comply with APP 8. We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with APP 8.

#### **7. Using our website and cookies**

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

## **8. Security and Data Retention**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

We will only retain your personal information as is necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. Retention periods vary depending on the type of data and the purposes for processing. In determining the appropriate retention period, we consider the following factors:

- The nature and sensitivity of the data.
- The potential risk of harm from unauthorised use or disclosure.
- Our legal obligations, such as regulatory or tax reporting requirements.
- Whether we need the data to maintain or improve our relationship with you.

Once the retention period has expired, we will securely delete or anonymise your personal data in accordance with applicable laws and regulations.

We confirm that, in line with our obligations under the Notifiable Data Breaches Scheme published by the Office of the Australian Information Commissioner, we have procedures in place should the confidentiality or security of your personal information be compromised. We confirm that we will advise you at the first reasonable opportunity following discovery of a security breach that is likely to cause serious harm, where your information is lost, stolen, accessed, used, disclosed, copied, modified or disposed of by an unauthorised person or in any unauthorised manner.

## **9. Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## **10. Use of Cookies**

To improve your experience on our website, we may use 'cookies': small data files that are served by our website and stored on your device. These are used by us or third parties for a variety of purposes including to operate and personalise the website.

Cookies may be used for recording preferences, conducting internal analytics, conducting research to improve our offering, assisting with marketing and delivering certain website functionality. You may refuse to accept cookies by selecting the appropriate setting on your internet browser. However, please note that if you do this, you may not be able to use the full functionality of our website.

## **11. Accessing or correcting your personal information**

We are committed to maintaining accurate, timely, relevant and appropriate information. Where requested, we will provide you with a copy of the personal information that we hold which relates to you, provided that the request is made in accordance with the APPs (contained in the Privacy Act). We will also update any inaccurate information about you if you inform us that the information is inaccurate, out of date, incomplete, irrelevant or misleading.

There are no charges for requesting access to or the correction of your personal information, however if the volume of information we hold is excessively large, we reserve our rights to charge you any reasonable administration fees (including fees for photocopying) associated with your request. You can contact our privacy officer regarding access to or correction of your information using the information in the Contact Us section.

We will respond to those requests within 30 days in accordance with our obligations under the Privacy Act. If we refuse a request to access or correct personal information, where reasonable, we will provide you our reasons for doing so and information about your ability to complain about such refusal.

In order to protect the confidentiality of your personal information, details of your information will only ever be passed on to you where we are satisfied that the information relates to you. Accordingly, we may request documentation from you which confirms your identity before passing on any personal information which relates to you.

## **12. Making a complaint**

We take privacy and our obligations under the Privacy Act very seriously. If you have complaints or concerns regarding potential breaches by us or our contractors of the APP or any other applicable laws or regulations, you can make a complaint. Complaints must firstly be made to the Privacy Officer.

We will review and respond to complaints in good faith within 14 days. If you remain dissatisfied and are concerned that we have not complied with your legal rights or applicable privacy laws, you may a formal complaint directly to the Office of the Australian Information Commissioner (OAIC) using the webform available on their website:- <https://www.oaic.gov.au/contact-us>.

## **13. Contact Us**

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

To: Privacy Officer, Moreton Hospitality Group

Address: GPO Box 2779, Brisbane, Qld 4001

Phone: +61 (7) 3100 1300

Effective: 26 September 2024