

Regional Motels Pty Ltd

Privacy Policy

This is the Privacy Policy of Regional Motels Pty Ltd ABN 67 641 735 980 ('Regional Motels', 'we' or 'us'). This Privacy Policy ('policy') applies to all information collected by us, including via our website at the domain <https://www.zebramotelcoffsharbour.com.au/> ('website').

Application of this policy

The purpose of this policy is to ensure that any individual who provides personal information to Outback Australia is protected under Australian law in accordance with the Australian Privacy Principles ('APPs') in the *Privacy Act 1988* (Cth) ('Privacy Act') and any other relevant laws. Words defined in the Privacy Act have the same meaning when used in this policy.

Personal information

In Australia, 'personal information' is any information or an opinion about an identified individual, or an individual who is reasonably identifiable.

The kinds of personal information we collect about you will depend on how you interact with us:

- **When you make a booking or browse our website:** we collect your name, address, email address, telephone number, information about your booking, information about your browsing behaviour on our internet sites and apps, including promotions you activated, information collected and held via our secure financial systems about the payment method you use for your bookings with us (including payment card and transaction details), website and app browsing data, comments, and feedback. This information must be provided to allow us to effect processing of your bookings, and to contact you if necessary.
- **If you sign up as a customer on our website:** we will collect your name, address, telephone number and email address. We will not disclose your details for inclusion in the mailing lists of any parties that are not members of Regional Motels.
- **When you use our website:** General site traffic data is collected for the purpose of site maintenance and improvement and provides information about which and how often certain pages are viewed. This helps us to understand what our customers are interested in and alerts us to any areas of the site that may be difficult to navigate. The data we collect may include your IP address, your approximate geographic location, and data sent to us by your web browser, such as your operating system, browser type and version, computer type, MAC address and screen resolution. We may also collect metadata including social media content (including tags, handles and other social media profile information). This information may be collected directly and/or via cookies. Cookies and other tracking technologies are used by us and our third-party partners, such as our advertising and analytics partners and our fraud prevention service provides, to provide functionality and to recognise you across different services and devices. You may opt out of sending us cookie data but this may adversely affect your experience using our services.
- **If you elect to pay online using your credit card:** your credit card details are not stored by us. They are encrypted and passed directly to the Bank through our security provider.
- **If you email us:** your name, email address and any other information contained within your email.
- **If you mail us:** your name, mailing address, and any other information you provide in the letter.
- **If you call us:** your name, phone number and any other information you provide us.
- **If you contact us via social media:** your name, social media account username, date of birth, occupation, address or any other information publicly available on your account or that you may choose to provide us.
- **When you apply for a job with us:** Personal information collected from employment applications by post or by email to Regional Motels will only be used for the purpose of assessing a person's

suitability for available employment positions. Your employment application will be stored by us on file for the duration that it is relevant to the role you have applied for and then destroyed. This information will be disclosed to third parties as required for the purpose of assessing your application. The range of personal information that may be collected about applicants for employment include name, contact information (including email address, telephone number and postal address,) employment and training history and other information included as part of an application, resume or curriculum vitae. Information may also be obtained from psychological or aptitude tests and from referees.

- **When you engage in business with us:** Regional Motels may collect personal information from you when you provide it to us in the ordinary course of business, for example when you contract with us or otherwise engage with our business.
- **Enquiries:** when you make an enquiry of us online or by phone, we may collect your name and contact details in order to respond to your enquiry.

Our services are not directed at individuals under the age of 16 and we do not knowingly collect personal information from such individuals. If we become aware that a person under the age of 16 has provided us with personal information we will take steps to delete or de-identify such information.

In each case, by giving us access to this information, you are consenting to our ability to collect, store, use and disclose such information strictly in line with our Privacy Policy.

What happens if you do not provide personal information?

The main consequence for you, if some or all of the above personal information is not collected by us is that we may not be able to provide products, services or information to you, or be able to provide them to the same standard as if we had the information requested.

Why does Regional Motels collect personal information?

The personal information that we collect about you may be used by us for a number of purposes connected with our business including to:

- provide you with information that you have requested;
- verify your identity;
- contact you;
- process bookings you make through our websites;
- add you to our mailing list;
- send you marketing materials;
- promote our products and services;
- to provide refunds;
- to assess your creditworthiness;
- improve the website experience of our visitors;
- provide a personalised experienced and personalised recommendations;
- provide goods or services to you or to receive goods or services from you;
- address any issues, problems or complaints that we or you have regarding our relationship;
- contract with you; and
- comply with our legal obligations.

We also use personal information for our own internal business purposes including:

- for data analysis to improve our products, services and business;
- auditing our internal processes to ensure they function as intended and that we comply with regulatory requirements;
- for fraud and security monitoring;

- developing new products and services;
- identifying usage trends so we can understand which part of our services are of most interest to our customers;
- determining the effectiveness of marketing campaigns so that we can adapt to the needs and interests of our customers; and
- operating and expanding our business activities such as understanding which of our products and services are of most interest to our customers, so we can focus on our customers' needs.

Sensitive information

Sensitive information is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

We will not ask you to disclose sensitive information to us. If sensitive information is disclosed to us, we will take reasonable steps to de-identify the data or destroy it where we can.

Who do we disclose your personal information to?

We do not provide any personal information provided by you to any third parties other than to our related entities and affiliates, where required by law or as set out in this Privacy Policy. However, we may disclose your personal data listed below or as otherwise permitted by the Privacy Act.

In the course of conducting our business we may provide your personal information to third parties, such as fraud prevention providers, web hosting providers, IT systems administrators, mailing houses, payment processors, data entry service providers and electronic network administrators, credit reporting agencies professional advisers, such as lawyers, auditors, accountants, insurers, credit reporting agencies and other financial institutions including our own bankers, other persons that we need to deal with in connection with the engagement of staff, any other commercial partner, supplier or service provider.

We may disclose your personal information to third parties:

- to enable our website to function in the manner it is intended;
- for fraud detection and security detection or to prevent payment fraud;
- as part of our business processes and for the purposes described above in 'Why does Regional Motels collect personal information';
- to meet the purpose for which your personal information was submitted;
- if we have your consent to do so or otherwise when we are authorised by law;
- to comply with any applicable law, regulation, court order or other legal requirements, including supplying such information to third parties such as lawyers, regulators or law enforcement where applicable law compels us to do so;
- conduct promotional activities, provide special offers, and send you marketing communications from us and our related companies in Regional Motels (subject to your right to opt out of these at any time);
- to assess your creditworthiness;
- to obtain from a credit reporting agency a credit report containing personal credit information about you;
- to notify other credit providers of a default by you;
- to exchange information with other credit providers as to the status of a credit account between you and us;
- to process product refunds; and
- as generally required when we need their assistance in our day-to-day business operations or so can work with them to provide goods or services to you.

We may also use and share your personal information:

- to transfer your information to a third party as a result of a sale, merger or consolidation of us, insofar as the third party has agreed to comply with all privacy laws applicable to it and adhere to terms similar to this Privacy Policy;
- among our related entities or business units or brands within Regional Motels; and
- with any other persons and entities permitted under the Privacy Act.

We will not supply, sell or in any other knowing way, make available your personal information to other parties other than in the circumstances outlined above, unless you authorise us to do so.

Does Regional Motels store personal information outside of Australia?

Some of our service providers may be located overseas or may store information (including your personal information) that we provide to them overseas. Therefore, the personal information you provide to us may be held overseas. The jurisdictions in which the personal information you provide to us may be held include Australia, New Zealand and the United States of America.

Personal information you disclose to us will only be held or processed overseas in accordance with all applicable law. If you do not agree to the transfer of your personal information outside of Australia, please contact us via the details set out below under the heading 'Contact Details'. In these circumstances, we may be prevented from providing products or services to you.

Can you deal with Regional Motels anonymously?

Regional Motels will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Regional Motels to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services.

How do we hold your information?

Any personal information we hold is generally stored in paper-based files or electronically in computers or cloud systems operated by us or our service providers (either in Australia or overseas).

All personal information held by us will be handled and stored in accordance with our obligations under the Privacy Act. We will take reasonable steps to:

- implement practices, procedures and systems in our business that will ensure compliance with our legal obligations and to deal with inquiries or complaints about compliance with our legal obligations;
- make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- protect the information from misuse, interference, loss or unauthorised access, modification or disclosure both physically and through security methods; and
- destroy or permanently de-identify the information if it is no longer needed for any purpose.

Regional Motels maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems. We use encryption to ensure the secure transmission of information via the internet. However, users of our websites are encouraged to exercise care in sending personal information via the internet.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others, and to the extent permitted by law, exclude all liability (including in negligence) for the consequences of any unauthorised access to your personal information.

Please notify us promptly if you become aware of any breach of security. We will comply with all mandatory notification requirements in respect of security breaches as required by the Privacy Act.

How long do we keep your personal information?

We will retain your personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include:

- the length of time we have an ongoing relationship with you and provide services to you;
- legal obligations we may have to keep (or destroy) your personal information; or
- legal advice we receive (such as in regard to litigation, regulatory investigations or applicable statutes of limitation).

When your personal information is no longer required it is destroyed in a secure manner.

Do we engage in direct marketing?

As part of our promotional, educational and remarketing campaigns, we may contact you using the email address you have provided. If you prefer not to hear from us, you can opt-out at any time. To do so please click on the "unsubscribe" link at the bottom of any email we send you and you will be removed from any future communications. You can also unsubscribe (or re-subscribe) at any time by or by contacting us at the details at the end of this Privacy Policy.

If you opt-out of receiving marketing material from us, Regional Motels may still contact you in relation to any ongoing relationship with you.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Advertising and tracking

When you view our advertisements or links on a Third Party website, that third party may use 'cookies' and in some cases 'web beacons' to collect information on you such as:

- the server your computer is logged onto;
- your browser type;
- the date and time of your visit; and
- the performance of their marketing efforts.

When you access our website after viewing one of our advertisements or links on a Third Party website, the third party may collect information on how you utilise our website (e.g. which pages you view) and whether you complete an online order or have subscribed to our newsletter.

Cookies

We use 'cookies' to provide you with better and more customised service and with a more effective website. When you access our website, you consent to our use of cookies as described in this policy and our website Terms and Conditions.

A 'cookie' is a small text file placed on your computer by our web page server. A cookie can later be retrieved by our webpage servers. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your internet browser.

We use cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise our website for you;
- for statistical purposes;
- to identify you if you have accessed a Third Party website; and
- for security purposes.

Security of information

We take all reasonable steps to protect the information in our systems from misuse, interference, loss, and any unauthorised access, modification, or disclosure. If we no longer require your information, and we are legally permitted to, we will take all reasonable steps to destroy or de-identify the information.

We take reasonable steps to preserve the security of cookie and personal information in accordance with this policy. If your browser is suitably configured, it will advise you whether the information you are sending us will be secure (encrypted) or not secure (unencrypted).

Information that is not personal information (De-Identified Data)

You acknowledge that we may use or modify data and information (including your personal information) that you provide us or we collect from you, including by aggregation and other de-identifying techniques, to produce or derive a compilation of data which has personal information removed from it such that the identity of any individual person cannot be reasonably ascertained from the data ('De-Identified Data'). You agree that we own all rights, title and interest in and to the De-Identified Data and consequently we may use such De-Identified Data for our own commercial purposes. De-Identified Data is not personal information because the De-Identified Data does not directly or indirectly reveal the identity of a person. However, if we combine or connect De-Identified Data with other data so that the identity of a person can be reasonably ascertained, we will treat the combined or connected data as personal information which may only be used, disclosed, stored and transmitted in accordance with this Privacy Policy.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you can do so by contacting us via the "Contact Us" page on our website or by using one of the methods set out below. We will generally rely on you to ensure the information we hold about you is accurate or complete.

We will correct your personal information at the time of your request if appropriate. Otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

Access and correction to your personal information

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge an administrative fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, where the information is stored on another entity's server and we do not have access to it, if the information relates to existing or anticipated legal proceedings, if your request is vexatious or if the information is commercially sensitive.

An explanation will be provided to you if we deny you access to the personal information, we hold about you.

If we refuse to correct personal information, we will provide you with our reasons for not correcting the information.

We may require you to provide proof of or verify your identity if you want to access or correct your personal information that we hold. This verification of identity may occur over the phone, by email, video call or in person.

Contact details

You can contact us by email to the following address bookings@zebramotelcoffsharbour.com.au.

Changes to this policy

This policy is subject to change over time without prior notice. We may amend this policy by updating this posting.

Copies of this policy

You can ask us to provide you with a copy of this policy, including a hard copy, by contacting us using the contact details above.

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