

Waratah Hotel Management Privacy Policy

1. Waratah Hotel Management and privacy

Waratah Hotel Management is an Australian hospitality group. In operating our restaurants, bars, hotel accommodation, events and related hospitality businesses, Waratah Hotel Management collects and handles personal information.

Waratah Hotel Management understands the importance of protecting the privacy of an individual's personal information and being open and transparent in how we handle and deal with personal information.

This privacy policy sets out how Waratah Hotel Management aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Waratah Hotel Management and how Waratah Hotel Management collects, holds, uses, discloses and otherwise manages your personal information.

Waratah Hotel Management will regularly review its 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 or can otherwise be obtained by contacting us and requesting a copy.

2. Compliance with Privacy Act

In collecting, holding, using, disclosing and otherwise managing personal information, Waratah Hotel Management will comply with the Privacy Act and the Australian Privacy Principles in the Privacy Act 1988.

3. 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 our hospitality and related services or as a result of our other interactions or dealings with you, Waratah Hotel Management may collect your personal information.

Waratah Hotel Management provides a diverse range of hospitality services and experiences. As a result, the kinds of personal information that Waratah Hotel Management collects will vary depending on our particular interaction or dealing with you. However, generally speaking, the kinds of personal information Waratah Hotel Management collects may include:

- (a) contact and identification information such as your name, address, telephone number and email address (for example where you make a reservation at a Waratah Hotel Management Venue or join one of our mailing lists);
- (b) information regarding your ordering history, food or beverage or other dining preferences, to assist us to provide a more customised dining experience;
- (c) payment information, such as credit card or other payment details;

(d) where you organise or conduct an event, information regarding the event, your guests and any relevant requirements;

(e) information regarding your experience at a Waratah Hotel Management Venue (for example as part of our guest feedback activities or where you contact us with feedback); and

(f) where you apply for employment with Waratah Hotel Management (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.

Depending on the Waratah Hotel Management Venue you attend, we may also collect identification information, such as drivers licence or passport information and biometric information (for example face scanning). We generally collect this information because we are required to do so by law and/or for venue, patron and employee security purposes. Specific information regarding the collection and handling of this type of personal information will be available at the relevant venue.

Waratah Hotel Management also collects CCTV footage at many of Waratah Hotel Management Venues, including for venue, patron and employee safety purposes. 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.

At some Waratah Hotel Management Venues or Waratah Hotel Management Events, we may also take photographs or other images or content (such a 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 such a Waratah Hotel Management Venue or Waratah Hotel Management 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 Waratah Hotel Management websites and social media sites.

Waratah Hotel Management may also 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 Waratah Hotel Management does collect sensitive information, for example where we need to collect health information regarding your allergies or in a medical emergency. If we do collect sensitive information about you, we will only do so with your consent or where we are required or authorised to do so by law.

4. Collection of personal information by Waratah Hotel Management

Generally, Waratah Hotel Management collects your personal information directly from you. For example, Waratah Hotel Management may collect your personal information where:

- you make a reservation for a Waratah Hotel Management Venue or event;

- you join one of our mailing lists, fill out a survey, enter a promotion, request services or otherwise provide us with your details;
- you dine at or attend a Waratah Hotel Management Venue;
- you stay at any Waratah Hotel Management Venue that provides accommodation services;
- you organise an event using Waratah Hotel Management Events or participate in or attend an event organised by Waratah Hotel Management Events;
- you sign up to or participate in any Waratah Hotel Management loyalty program;
- you provide feedback to us regarding your experience at a Waratah Hotel Management Venue or your other interaction with Waratah Hotel Management;
- you post information to any of our social media sites;
- you attend a Waratah Hotel Management Event; or
- you apply for or express an interest in employment with us.

We generally collect personal information directly from you. However there may be occasions when Waratah Hotel Management collects your personal information from someone other than you, for example from:

- other entities within Waratah Hotel Management;
- our service providers or contractors (for example where we appoint a service provider/contractor to assist with conducting an event);
- an information services 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 Waratah Hotel Management.

5. Purposes for which personal information is used

Generally speaking, Waratah Hotel Management collects and uses personal information so that we can provide our hospitality services, interact with you in relation to our services and venues and administer and manage our business and our venues.

Some examples of the purposes for which Waratah Hotel Management collects, holds, uses and discloses your personal information include to:

- take bookings for Waratah Hotel Management Venues or Waratah Hotel Management Events;
- provide dining and other hospitality experiences at Waratah Hotel Management Venues;
- provide our event services to you;
- manage and administer the provision of our services and our relationship with you;
- verify your identity;
- 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 Waratah Hotel Management and our venues

- analyse information we collect so that we can administer, support and improve and develop our business and the products and services we offer, including by undertaking data analytics and related activities using your personal information;
- comply with the obligations of Waratah Hotel Management under any applicable laws; and
- consider any application you make for employment with us.

In addition to the purposes listed above, Waratah Hotel Management 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. Where personal information is used or disclosed, Waratah Hotel Management takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed.

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

6. Direct marketing

In addition to the purposes outlined in paragraph 6 above, Waratah Hotel Management 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 a particular Waratah Hotel Management Venue or sign up for the mailing list of a particular Waratah Hotel Management Venue, this may include sending you information about that Waratah Hotel Management Venue or other Waratah Hotel Management Venues, Waratah Hotel Management Events or services that may be of interest to you.

In doing so, Waratah Hotel Management may disclose your personal information to the companies within Waratah Hotel Management or other entities with which Waratah Hotel Management has a commercial relationship or arrangement 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.

If you do not wish to receive such communications, you can opt-out at any time by contacting Waratah Hotel Management via the contact details set out in paragraph 12 of this privacy policy or through the opt-out mechanism contained in a marketing communication to you.

7. Disclosure of personal information

Waratah Hotel Management discloses your personal information for the purpose for which Waratah Hotel Management collects it. As a result, generally Waratah Hotel Management will only disclose your personal information for a purpose described in this privacy policy. This may include disclosing your personal information to:

- the companies or other entities within Waratah Hotel Management;
-

- 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 or other business or administration service providers);
-
- Waratah Hotel Management’s auditors, tax, insurance, legal or other professional advisors;
- persons or entities considering acquiring an interest in Waratah Hotel Management’s business or assets; or
- Waratah Hotel Management’s insurance providers.
-

Waratah Hotel Management 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.

8. Overseas disclosures

Some of the parties that Waratah Hotel Management discloses your personal information to may be located outside Australia, including technology service providers located in Canada, the United States and the United Kingdom. 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 and the Australian Privacy Principles in the Privacy Act.

9. Links to other websites

When you access our websites 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.

10. Cookies and website statistical information

Waratah Hotel Management may collect statistical information when you access and use our websites and any online platforms available via our websites, by utilising features and technologies of your internet browser, including cookies and pixel tags. We use this information to analyse how our websites and other online services are being used and seek to improve our websites and other online services and provide more user friendly and customised websites and

online services. These features and technologies do not specifically identify you unless you expressly provide to us personally identifiable information. 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.

11. Security of personal information

Waratah Hotel Management takes 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.

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

12. Access and correction

Waratah Hotel Management takes 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 Waratah Hotel Management. If at any time you would like to access or correct the personal information that Waratah Hotel Management holds about you, or you would like more information on Waratah Hotel Management's approach to privacy, please contact Waratah Hotel Management Privacy Compliance Officer using the details set out in paragraph 14 below. Waratah Hotel Management will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- you will 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;
- Waratah Hotel Management requests that you be reasonably specific about the information you require; and
- Waratah Hotel Management may charge you a reasonable administration fee, which reflects and will not exceed the cost to Waratah Hotel Management for providing access in accordance with your request.
-

Waratah Hotel Management will endeavour to respond to your request to access or correct your personal information within 30 days from your request. If Waratah Hotel Management refuses your request to access or correct your personal information, Waratah Hotel Management will provide you with written reasons for the refusal and details of complaint mechanisms.

If you are dissatisfied with Waratah Hotel Management's refusal to grant access to, or correct, your personal information, you may make a complaint to the Office of the Australian Information Commissioner.

13. Contacting Waratah Hotel Management

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 Waratah Hotel Management's Privacy Compliance Officer using any of the following contact details:

Privacy Compliance Officer

Email: privacy@waratahmanagement.com.au

Phone: 02 9098 9100

Post: 1/207 Ben Boyd Rd, Neutral Bay NSW 2089

14. Privacy complaints

Please direct all privacy complaints to Waratah Hotel Management's Privacy Compliance Officer. 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 Waratah Hotel Management.
-

Waratah Hotel Management will acknowledge your complaint within 7 days of receipt and endeavour to resolve it within 30 days, unless Waratah Hotel Management informs you otherwise and seeks your agreement in writing.

Waratah Hotel Management 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 Waratah Hotel Management will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner.