### Privacy Statement Summary - RIALTO SUITES

This Privacy Statement regulates the operations of the **RIALTO SUITES** at 36-44 HIGH STREET, Fremantle W.A. 6160

We are committed to the protection of your Personal Information.

You can find out how we aim to achieve this by reading our complete Privacy Statement below. Our obligations and your protections are summarised here for your convenience.

#### Consent

The Personal Information we collect about you may include your name, contact details, and billing information, but may also include information about the goods and services you buy from us, and how you interact with us (for example, how you access and use our websites or mobile applications). If you do not provide your consent, or if you withdraw your consent to our use of your Personal Information, it may mean we are unable to provide you with the same services, offers, or discounts that we would otherwise be able to provide.

#### Collection

When you provide us with, and consent to our use of, your personal information (for example, by agreeing to our terms and conditions), you consent to our collection and use of your Personal Information (which is information about you which identifies you, or which can be used to reasonably identify you) in accordance with this Privacy Statement. You can withdraw your consent at any time by contacting us. You can also opt-out from receiving any marketing communications from us or from our Marketing Partners, and from our use or disclosure of your Personal Information for marketing purposes.

We collect Personal Information about you directly from you or by your use of our websites or mobile applications, from public sources, and in some cases from third party ticketing and event organisations.

#### Use

Your Personal Information is used to deliver our products and services to you, to improve our services, and to market products and services to you. In some cases, we share your Personal Information with third parties who perform these activities or do so on our behalf.

#### Storage

We take commercially reasonable steps to secure your Personal Information from unauthorised access, and to ensure the people we share your data with do the same. Third parties to whom we send your data may be located in or operate data centres located in Australia, Europe and the UK.

#### Access / collection / deletion

You can request access to, correction, or deletion of your Personal Information or withdraw your consent to our use of your Personal Information by contacting us at admin@rialtofremantle.com.au

## **RIALTO SUITES** Boutique Hotel

The **RIALTO SUITES** Apartment Hotel provides serviced apartment accommodation to its clientele. We appreciate that you trust us to collect, use and store Personal Information obtained from you in the course of providing this service in a legally-compliant manner. We are consequently committed to the protection of your personal information in accordance with the law and this Privacy Statement.

# **Collection of Personal Information**

We may collect a range of Personal Information about you. This may include but not be limited to:

- your name, signature, address, phone number or date of birth;
- <u>sensitive information;</u>
- <u>credit and banking information;</u>
- photographs;
- internet protocol (IP) addresses;
- location information from a mobile device;
- information about how you use the products and services we provided;
- records of our communications with you; and
- social media handles and information.

#### Consent

This Privacy Statement details the collection and handling of your Personal Information. This includes information about you which:

- identifies you; and/or
- can be used to reasonably identify you.

In consenting to the use of your Personal Information, you agree that we may use your Personal Information in accordance with this Statement. You can notify us at any time if you wish to withdraw your consent.

Withdrawal of, of failure to provide your consent to our use of your Personal Information, may mean we are unable to provide you with the same services or the same level of service that we would otherwise be able to provide. For example, we may not be able to provide you with personalised recommendations, or with exclusive or discounted offers.

In some instances, there may be specific and additional privacy provisions that apply to our collection and use of your Personal Information.

As an example, Personal Information provided when participating in a promotion, entering a competition, subscribing to a newsletter, or participating in a survey may be subject to a different privacy Statement or contractual terms. If there is any inconsistency between this Privacy Statement and those specific and additional provisions, the specific and additional provisions will prevail.

## **Collection & Storage**

Your Personal Information may be collected:

- when you purchase products or services from us at our venue or through our websites or mobile applications;
- when you sign up to become a member of our loyalty programs;
- when you submit a feedback, query or request to us;
- when you participate in a promotion, competition, or survey that we run;
- when you fill in forms on our website;

- when you check-in to our accommodation;
- when you sign-up to receive our emails, newsletters, information about our special offers, and/or any other promotional material;
- by tracking your use of our websites or mobile applications;
- through our CCTV systems at our venues;
- from public sources;
- from third parties who are entitled to disclose that information to us (including third party ticketing and events organisations); and
- when you apply for a job with us

## **Use & Disclosure**

We use Personal Information that you provide to us:

- to help you access the services or acquire the goods we provide;
- to provide you with information and offers in relation to goods and services offered by us that may be of interest to you;
- to improve our products and services and tailor them to your interests;
- to determine your eligibility or suitability for any of our products or services;
- when you purchase a product through our websites, to display to you offers of goods and services from third parties that may be appropriate to your interests;
- to modify advertising (including re-marketing) shown on our websites so that it is customised or more relevant to your interests, characteristics or general location;
- to answer your feedback, queries and requests;
- to comply with our legal and regulatory obligations;
- to develop and improve our existing products and services and create new products and services (including by carrying out market analysis and research);
- to monitor use of our products and services (including our websites);
- to improve customer service and our customer relationships;
- to assess, maintain, upgrade and improve our products and services;
- to carry out education and training programs for our staff;
- to manage and resolve any legal or commercial complaints or issues; and
- to carry out planning and forecasting activities and other internal business processes

We may also use your Personal Information for other purposes as authorised by you, or in accordance with your requests or instructions.

We will only disclose your Personal Information to third parties in compliance with this Privacy Statement.

We may share Personal Information about you with:

• your representatives, advisers and others you have authorised to interact with us on your behalf;

- our staff who need the information to discharge their duties;
- related bodies corporates;
- our business partners, agents and service providers (including information technology service providers, data hosting and processing companies, loyalty, data and research companies, fraud detection, prevention and security service providers and social media channel operators);
- our Marketing Partners;
- payment system operators, banks and financial institutions;
- prospective purchasers of all or part of our business assets or shares in our company or a related entity;
- professional advisers who we engage to provide advice on our business; and
- government authorities who ask us to disclose that information, or to other people as required by law.

## Marketing

We may from time to time use your Personal Information in order to send you marketing materials about products or services that you may be interested in (including in some cases products and services that are provided by third parties). You can opt-out of receiving marketing communications from us by contacting us using the details in the "Questions & Concerns" section below, or by following the "unsubscribe" or "opt-out" link in the communication you receive from us. We will from time to time engage trusted third-party marketing and media partners and programmatic or display vendors (collectively Marketing Partners) to:

- send you marketing or promotional content and offers that you may be interested in; and
- deliver to you personalised advertisements or targeted promotional content via email, online, or via social media platforms.

Promotional content and personalised advertisements may be for goods or services provided by external businesses.

## Security & Storage

We generally store the Personal Information that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers located in the countries identified in section 9 of this Statement.

We may also, at times, keep hard copy records of Personal Information in physical storage facilities. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the Personal Information that we hold, and we update these from time to time to address new and emerging security threats.

## **Overseas Disclosure**

Third parties to whom we may disclose Personal Information may be located outside Australia. We use data storage facilities in Europe and the UK. We take commercially reasonable steps to ensure that any overseas recipient of Personal Information has appropriate safeguards in place to ensure a level of protection of your Personal Information that does not breach Australian privacy law or this Privacy Statement.

#### **Access to and Correction of Personal Information**

You have a right to access and correct most of the Personal Information we hold about you. If you wish to access or correct your Personal Information, please contact us via the details provided in the "Questions or Concerns" section below.

To protect the integrity and security of the Personal Information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases we may charge you an administration fee for providing you with access to the information you have asked for, but we will inform you of this before proceeding. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request.

## **Internet Data**

We may collect information and data when you visit our website using cookies, tags, pixels and other similar technologies (Cookie Information). Cookie Information includes pieces of information that a website can transfer to an individual's computer hard drive for record keeping, such as the IP address of a user's computer, the URL of a page visited and the time the page was visited by the user. The collection and use of Cookie Information is an industry standard and many websites collect this information.

Cookie Information is useful for facilitating a user's access to and use of a website. It allows us to track usage patterns and compile data that can help us improve our services. Cookie Information is useful to advertisers because it helps them understand their advertising audience, and to deliver advertising.

We may use Cookie Information, or engage third parties who collect similar information and data from publicly available sources, to deliver or modify advertising (including re-marketing) that is customised or more relevant to your interests, characteristics or general location (Targeted Advertising).

In order to carry out Targeted Advertising we may build a user and/or device profile by: - using Cookie Information and de-identified system information that we hold;

- using device-matching technologies that utilise mobile device advertising identifiers as well as Cookie Information; and

- engaging or working with third parties who provide us with information about you collected from publicly available sources or from their own databases.

We may also work with other companies to advertise their products and services online using Cookie Information. When we provide Cookie Information to third parties, we take commercially reasonable steps to ensure that that information is de-identified.

Examples of third parties that we may work with and disclose Cookie Information to include external companies and agencies that provide programmatic advertising services, specialist data companies, advertising platform providers, advertising servers, data partners, specialist data providers and social media operators such as Facebook.

The settings of most web browsers can be modified to prevent the collection of Cookie Information. You can also delete Cookie Information from your device.

Most mobile devices operating common operating systems such as Android or iOS record a unique advertising identifier. This identifier may be part of the Cookie Information we collect, and can be reset in the device settings.

## **Sensitive Information**

Generally, we do not collect sensitive information. However, in some instances it may be necessary for us to collect sensitive information about you, for example:

- in the event you are involved in an accident, injury, or incident at one of our venues;
- if you engage in a high-risk activity at a venue we operate and complete a medical release form; and
- otherwise as required to comply with any law, regulations or Federal or State government mandates or requirements, including in respect of a pandemic, epidemic or state of emergency.

Any use of sensitive information we collect from you may be subject to additional relevant legal restrictions outside this Privacy Statement and, unless information is required to be collected or released by any law or regulation, additional express consent that you may choose to provide at the time you provide that information to us.

#### Amendment

The Privacy Statement may be amended from time to time to comply with applicable legislation and regulations. You can find the updated version online via our website.

## Complaints

If you have any concerns about this Privacy Statement, our compliance with the Australian Privacy Principles or relevant law within your region, or the standards of our collection, use or disclosure of Personal Information, we encourage you to contact us in writing.

Any complaints will be dealt with in an efficient and transparent manner.

In respect of Personal Information we collect in Australia, you are also able to make a complaint to the Office of the Australian Information Commissioner (OAIC). Contact details can be found at the OAIC website: <u>www.oaic.gov.au</u>.

## **Questions or Concerns**

We are committed to maintaining the privacy of your Personal Information.

We welcome your questions or complaints. Please direct these to the Hotel Manager at admin@rialtofremantle.com.au