



# PRIVACY POLICY

We respect the privacy of all our customers and business partners, and treat personal information (personal data) provided by you to us as confidential. We know that you are concerned how information about you is collected, processed, used and stored, and we appreciate you trusting that we will do so with every due care and diligence.

We have provided this Privacy Policy as an explanation of the information we collect, how we process and use it, and how the use of this information can benefit your experience on our web sites and products and services we provide.

## 1. WHAT INFORMATION ABOUT YOU DO WE COLLECT

In order for us to operate effectively and provide you with the best experiences with our services, we may request and collect information about you, whether as hotel guests, loyalty programme members, web site visitors or you contacting us for any other purposes, that includes personal information that can identify you as an individual.

Your personal information can come to us via various channels, including but not limited to:

- when you browse and interact with our website and/or use any mobile apps that we may make available - such as make a booking via our Online Reservation system, make an inquiry, sign up for newsletter subscription or make brochure requests or download and use our mobile apps
- through your use of our products and services – such as when you stay as a guest or visits the hotels, restaurants or facilities managed by us
- when you submit enquiries to us or provide us with you feedback
- when you participate in our promotional offers, competitions or surveys
- as a member of our loyalty programmes or when your friend refer you to our programmes
- from third parties – such as partners we work with or public databases – where you have provided your consent to the third party or to us to that information sharing taking place or where we have a legitimate interest to use the personal information in order to provide you with our products and services

The types of personal information that we collect and process may include, but not be limited to (and may vary by jurisdiction):

- personal details, such as your name, gender, date of birth, nationality, passport and visa information, personal and work contact details (addresses, emails and telephone numbers)
- payment and credit card information, such as bank accounts, name of cardholder, credit card number, credit card billing address and expiry date
- guest stay information and lifestyle information, such as hotels where you have stayed, arrival and departure dates, room preferences, leisure activities, names and ages of children, observation of your services preference, and other information necessary to fulfil special requests



- information, feedback or content you provide regarding your interests and preferences
- loyalty program member information, online account details, profile or password details
- information from our security systems such as from our closed circuit television system, card key, internet login and firewalls
- information relating to your use and interaction with our website and mobile apps

Some of the personal information which you provide to us are considered “sensitive personal information” under the privacy and data protection laws in specific jurisdiction – such as personal information from which we can determine or infer an individual’s racial or ethnic origin, health or biometric data. We only process sensitive personal information in such jurisdiction if and to the extent permitted or required by applicable law.

Except where required by local laws, we do not knowingly collect personal information from our websites from any children or minors. As a parent or legal guardian, please do not allow your children or minors to submit personal information without your permission.

We may also collect non-personally identifiable information about you, such as internet log information or visitor behaviour patterns when you visit our websites on your use of our websites, communication preferences, travel habits, aggregated data relative to your stays, and responses to promotional offers and surveys. Please also refer to our Cookies policy.

## 2. HOW WE PROCESS AND USE YOUR INFORMATION

We may collect, process and/or use the personal information which we collect in order to:

- deliver our products and services to you – such as completing your reservations, sending you reservation confirmations, supplying the purchased goods and services, registering you for program membership, fulfilling a request for information, customising our services to your preferences, earning and redeeming rewards, keeping proper records of your transactions with us
- communicate and provide marketing and promotion to you – such as sending you information and updates on our products and services and other products and services that we think may be of interests to you, including latest promotions, competitions, joint- and cross promotions with our business partners, response to enquiries, to send you important information regarding our website, changes to our terms, conditions and policies
- develop and improve our services to you – such as performing market research, analytics and/or profiling, developing new products and services, improve the effectiveness of our website, your hotel experience, our various types of communications, advertising campaigns, and promotional activities
- work and cooperate with third party parties to deliver our products and services to you – such as travel agents, group travel organisation, or anyone involved in the process of making your travel arrangements, credit card companies, airline operators and third party loyalty programs
- maintain your safety and security as well as that of other guests and personnel – such as to make proper identification and verification in processing of transaction, implement security



surveillance and access controls when you visit or stay at our hotels, and administer general record keeping

- meet applicable legal and regulatory requirements
- use it in other ways as required or permitted by law or with your consent

We will only collect, process and/or use the personal information where we are satisfied that we have an appropriate legal basis to do so. This may be because (i) you have provided your consent, (ii) our use of information is necessary for providing the products and/or services you have requested, (iii) our use of your information is in our legitimate interest as a commercial organisation, such as to operate and improve our services (including for profiling and targeted advertising) and in a way proportionate and respects your privacy rights, and/or (iv) necessary compliance with applicable laws, regulations, court orders or other legal process.

### 3. KEEPING AND SAFEGUARDING OF PERSONAL INFORMATION

To the extent permissible by applicable law, we generally only keep your information for as long as is reasonably required for:

- the purposes for which that personal information was provided
- ongoing business need, including record keeping, fraud prevention, or if we reasonably believe there is a prospect of litigation
- as necessary to meet legal, regulatory, tax or accounting needs

We take reasonable steps to safely and securely delete, dispose of, anonymise and/or block personal information when we no longer need it.

**Information security:** We endeavour to protect your personal information we maintain and have implemented reasonable technical, organisational and administrative measures to keep your personal information safe and secure and to protect it against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We will review, monitor and update these security measures to meet our business needs, changes in technology and regulatory requirements.

**Information transfer overseas:** We do business globally. In order for us to operate effectively and provide you with the best experiences with our services, we may centralise certain aspects of our information processing activities and may have databases in different countries (some of which are operated by our local group company and some of which are operated by third parties on our behalf). We may therefore have to share and transfer your personal information from one country to another, or even across multiple jurisdictions, such as:

- in or to Australia where our corporate office is located
- in those countries in which we manage and operate hotels, residences, sales or representative offices
- in those countries where our third party suppliers and/or services providers, agents, advisors or consultants are located

Your personal information may therefore be subject to privacy laws that are different from those in the country where the personal information is collected or those in your country of residences. We will endeavour that the transfer of your personal information is carried out in accordance with



applicable privacy laws and that appropriate technical, organisation and administrative measures are in place for its safeguard.

**Information sharing:** Insofar as reasonably necessary for us in delivering our products and services to you and for the purposes set out in this Privacy Policy, we may share your personal information with the below parties. The specific kind of information we share will depend on your activities with us and only to the extent as required or permitted by law, and/or with your consent.

- Our group entities, hotels and residences managed and operated by us
- Our business partners and third parties involved in the delivery of our products and services to you – including those involved in a sale of all or part of our business operations or assets and those for business, operational and general administration
- Our marketing and advertisement partners
- Third party services providers which process data (including personal information) for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures
- Our agents, advisors, consultants, other third party suppliers and/or services providers to assist us to operate effectively and provide you with the best experiences with our services
- Other third parties when we have your consent or are otherwise permitted by law to do so

**Information processing by third parties:** Like most international hotel brands, we may outsource the processing of certain functions and/or information to third parties, which may be located in countries other than the country where your information is collected or your country of residences. We may also engage market research firms to assist us in contacting our guests for the purpose of market research and quality assurance. When we do outsource the processing of your personal information to third parties or provide your personal information to third-party services providers, we oblige those third parties to protect your personal information with appropriate security measures.

#### 4. YOU CONTROL YOUR PERSONAL INFORMATION

You may always choose what personal information (if any) you wish to provide to us. Please note, however, some of our products and services to you may be affected if you choose not to provide certain details, for example, we cannot reply to you without a name or contact details.

If you provide us with your contact details (e.g. postal address, email address, telephone number or fax number), we may contact you to let you know about the products, services, promotions and events offered that we think you may be interested in. You can always choose whether or not to receive any or all of these communications by contacting us as described in Section 6 below. In addition to you agreeing to this Privacy Policy, we may also ask you to give us a separate consent before we send you with these information or indicate how you would like to receive any communication (e.g. via email or regular mail). After you have indicated your preferences, you can always change them.

You may be aware that the European Union General Data Protection Regulation gives certain rights to individuals in relation to their personal information - including the right of access to the personal information we hold about them, right of rectification, right to erasure, right to restrict data processing, right to object to processing, right to data portability, right to complain to a supervisory authority, and right to withdraw consent.



If you wish to exercise any of your rights in relation to your personal information, please contact us as described in Section 6 below.

## 5. OTHER RELEVANT INFORMATION

**Cookies:** To enhance your experience on our web site, some of our web pages may use "cookies." Cookies are text files that we place in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally-identifiable information unless you choose to provide this information to us by, for example, registering for one of our services. However, once you choose to furnish the site with your personal information, this information may be linked to the data stored in the cookie. We use cookies to understand site usage and to improve the content and offerings on our sites. For example, we may use cookies to personalize your experience at our web pages (such as to recognize you by name when you return to our site), save your username and/or password in password-protected areas, and to offer you products, programs, or services. Please refer to our Cookies Policy.

**Links to other websites:** For your convenience and information, we provide links to external third party websites, including web sites owned or controlled by independent franchisees, third party owners of hotel, resort, interval ownership, or residence properties that may use our brand name(s), or web sites not controlled or authorized by us. The linking of external third party websites to this website does not indicate any association with or endorsement from us. We cannot always ensure, and are not responsible or liable for, any content of these external third party websites, including, but not limited to, any advertising claims or marketing practices. Please note this Privacy Policy is limited to our own information collection practices. We strongly recommend that you read the separate privacy and security policies and the information collection practices of any external third party website before providing any personal information while accessing those websites.

## 6. HOW TO CONTACT US

For any questions, concerns or requests regarding this Privacy Policy or our information collection practices, please contact us by email at [reservations@redstarhotelspalmbeach.com.au](mailto:reservations@redstarhotelspalmbeach.com.au) or by post at Red Star Hotels Palm Beach 1026 Gold Coast Highway, Palm Beach Gold Coast, QLD 4221 Australia.

## 7. ABOUT THIS PRIVACY POLICY

This Privacy Policy may be applied to personal information processing activities globally. The processing activities may be more limited in some jurisdictions due to the restrictions of their laws. For example, the laws of a particular country may limit the types of personal information we can collect or the manner in which we process that personal information. In those instances, we may adjust our internal policies and/or practices to adapt to the requirements of local law.

This Privacy Policy is effective from 1 Aug 2018. From time to time, we may have to update, change, modify or amend this Privacy Policy. Subject to any applicable legal requirements to provide additional notice, when we make material changes to this Privacy Policy, we will provide you with notice as appropriate under the circumstances such as through our website or by sending you an email.



“We”, “us”, “ourselves” and “our Group” refers to Red Star Hotels Group and its affiliates directly involved in the group’s management and operations of properties.

This Privacy Statement is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this Privacy Statement, the English version shall prevail.

## 8. UPDATES TO THIS PRIVACY POLICY

By using our website, you agree to this Privacy Policy. Stated at the end of this Privacy Policy is the last date it was updated. We reserve the right to modify this Privacy Policy at any time. We encourage you to check our website regularly for any updates to this Privacy Policy.

## 9. AUSTRALIAN PRIVACY PRINCIPLES

If you are interested in obtaining further information about the Australian Privacy Principles, you can visit the Australian Government website at [www.comlaw.gov.au](http://www.comlaw.gov.au)

### **Legal Disclaimer**

*In addition to our rights of disclosure as mentioned hereinabove, we may also disclose your personal information when required by law or court order, or as requested by other government or law enforcement authorities, or in the good faith that disclosure is otherwise necessary or advisable including and without limitation to protect the rights or properties of our Group. This also applies when, in compliance with applicable laws, we have reason to believe that disclosing the personal information is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.*

### **Contents**

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