

PRIVACY POLICY

Introduction

This site is owned and published by Universal Hotels Group Pty Limited (ACN 617 487 108) trading as “Hotel Downing”, “Brighton Hotel” and “Oxford Hotel” (referred to as “Hotel Downing”, “Brighton Hotel”, “Oxford Hotel”, “Universal Hotels”, “we”, “us” and “our”). Our Privacy Policy sets out the ways in which we collect, use, disclose and protect any personal information that you provide to us. It serves as an expression of our commitment to protecting your personal information, but is not a contract between you and us.

Policy Statement

We strive to protect the personal information of our stakeholders including but not limited to our members (including potential members), sponsors, customers (including potential customers), applicants for employment, former employees, contractors (including potential contractors) (collectively “**Stakeholders**”). The Privacy Act 1988 (Cth) (“**Act**”) governs the way we collect, use, disclose and store our Stakeholders’ personal information. This Privacy Policy describes how we aim to adhere to the principles contained within the Act.

We collect, store and use personal information in order to:

- facilitate your membership of any of the Company’s venues;
- facilitate and/or determine applications for employment;
- facilitate competitions and give-aways;
- allow you to share feedback with the Company;
- allow the Company to provide you with relevant information regarding the Company’s business and offers,
- perform any other duty required to effectively operate and manage the business of the Company;
- collectively, the “**Purposes**”.

Policy Application

Personal Information means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual who is identified, or who can reasonably be identified, from the information or opinion (“**Personal Information**”). Personal Information may include “sensitive information” including information about an individual’s health, political opinions, racial or ethnic origin, religious beliefs or affiliations, membership of political organisations, philosophical beliefs, trade or trade union, sexual preferences or practices and criminal record.

Examples of Personal Information which may be collected from our Stakeholders and/or stored include without limitation:

- names, addresses and telephone numbers;
- date of birth;
- email addresses;
- employment history and qualifications, work availability and education history for applicants for employment;
- medical information for former employees;
- membership number; and
- computer IP addresses and online behaviour.

Policy Detail

(a) *Collection of Personal Information*

We may collect Personal Information from you in various ways, including dealing with you in person, over the telephone, through the Company's website ("**Website**") or ipads, email server, social media sites (including without limitation Facebook and Twitter), through forms, your resume or through customer feedback or survey form or competition entries.

Sometimes we may collect Personal Information from a third party (but only if you have consented to such collection) or from a publicly available source.

(b) Use of Personal Information

We collect Personal Information for the efficient fulfilment of the Purposes. The Company (and its employees, contractors, agents and officers) and other third parties we may engage to assist with the operation of our business, such as third parties we may engage to administer, maintain or assist with the operation of Website, marketing initiatives or the recruitment process, will have access to such Personal Information required by them to perform their functions and may not use such Personal Information for any other purpose.

(c) Disclosure of Personal Information

We may disclose your Personal Information to any of our associated entities (as that term is defined in s50AAA of the Corporations Act) ("**Associated Entities**") as we see fit for the purposes of our business and as otherwise provided by law. If we disclose your Personal Information to any of our Associated Entities they may use it for the same Purposes that we may.

We may also disclose your Personal Information to contracted parties whom we trust to perform services on our behalf (including IT companies, marketing, social media or PR agencies and other third parties we may engage to assist in the operation of our business). These persons will only have access to such Personal Information required by them to perform their functions and may not use such Personal Information for any other purpose.

Additionally, we may disclose your Personal Information where it is disclosed by us in a manner that does not readily permit identification of Personal Information relating to the Stakeholder.

Other than the circumstances described above, we will not give your Personal Information to a third party unless:

- you have given your consent;
- you would reasonably expect, or have been told, that information of that kind is usually passed to a third party;
- it is required by law; or a competent government authority;
- it is already within the public domain;
- it will lessen or prevent a serious and imminent threat to an individual's life or health.

(d) Cookies

A cookie is a piece of information that is stored on your computer's hard drive by your web browser that tracks your movements within websites. The Company uses cookies for tracking purposes and the data our server collects may include:

- your computer's IP address and browser type;
- webpages you were visiting before you came to our Website;
- the pages you visit on Website;
- the time spent on those pages, items and information searched for on our Website, access times and dates, and other statistics.

This information is collected for analysis and evaluation in order to help us improve our Website and the services and products we provide. This data will not be used in association with any other Personal Information. Most browsers are automatically set to accept cookies but usually you can alter the settings of your browser to prevent automatic acceptance.

(e) Site and Information Security and Storage

Upon receipt of your Personal Information we take all reasonable steps to protect that information against loss, unauthorised access, use, modification or disclosure. We store your information in a secure environment to include, password protected electronic files, maintaining virus protection software, securing paper files in locked cabinets and ensuring physical access is restricted to authorised personnel.

Although we have implemented substantial security measures in relation to Personal Information, as the Website is linked to the internet (and the internet is inherently insecure) we cannot provide any guarantee regarding security of your Personal Information and other data transmitted to the Website. We will not be liable in any way in relation to any breach of security or unintended loss or disclosure of Personal Information or other data due to the Website being linked to the internet.

When we no longer need your Personal Information and there is no obligation under law to retain the Personal Information, we will take steps which are reasonable in the circumstances to delete or de-identify the Personal Information.

(f) Third Party Sites

The Website may contain links to and from the websites of third parties ("**Third Party Sites**"). If you follow a link to any of these Third Party Sites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for the use of any Personal Information or other data by third parties to whom you may have been linked and been directed to from our Website.

(g) Transfers of Personal Information outside Australia

The Personal Information that we collect from you may be transferred to, and stored at, a destination outside Australia. The Personal Information may also be processed by individuals working outside of Australia who work for any of the Associated Entities or are our agents or contractors. Such processing may, for example, be required in order to provide support services to us.

(h) Access to and quality of your Personal Information

If you wish to correct or remove any of the details you have submitted to us, you may do so by updating your Personal Information or by contacting us via the details listed below. Our security procedures mean that we may request proof of identity before we reveal Personal Information.

We will take reasonable steps to ensure at all times that the Personal Information we keep about Stakeholders is accurate, complete and up to date. In order to achieve this, we may monitor your Personal Information and will update our database when you inform us of any change to your details. You have the right to request corrections of any inaccurate information.

If you request to see what Personal Information we hold about you, we will grant access unless we consider there is reasonable grounds to refuse, for example, where that disclosure would unreasonably interfere with the privacy of another individual.

(i) Contact details

You may direct any questions or concerns that you have regarding this Privacy Policy to:

Richard Haines

info@universalhotels.com.au

02 8080 7000

We will respond to you as soon as possible.

(j) Privacy Policy Amendment

We reserve the right to amend this Privacy Policy at any time and will publish all amendments on the Website.