



## **Privacy Policy**

In this Privacy Policy, 'us' 'we' or 'our' means Star Group Management (ABN 666 157 916 81) and its related bodies owns and operates a number of pubs, bars, restaurants and accommodation properties in Australia which provide a range of food and beverage services as well as event venues.

At Star Group Management, we are committed to respecting your privacy. This Privacy Policy sets out how we collect, use, store and disclose your personal information. Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode, and contact details.

We may update this Privacy Policy from time to time, and recommend you review it periodically so that you are updated on any changes.

### **What personal information do we collect?**

We may collect the following types of personal information:

Name, email address; telephone number; post code; postal address; date of birth; CCTV footage, purchasing behaviour, facial recognition, your photograph, postal address.

Any additional information that you provide to us, including through your use of our venues, our website, our online presence or through other websites or accounts from which you permit us to collect information; or any other personal information that may be required in order to facilitate your dealings with us.

### **How do we collect your personal information?**

We may collect personal information either directly from you, or from third parties, including when you:

Make a reservation at one of our venues, either over the phone or through an online booking form (which may be hosted by a third party), register on our website, leave a business card at a venue, redeem an offer at a venue, attend a function at one of our venues and consent to your photograph being taken.

Enter into a competition run with one of our partner advertisers, communicate with us through correspondence, telephone calls, or email, or when you share information with us from other social applications, online services or websites; or invest in our business or enquire as to a potential purchase of our business.

### **Recruitment**

In addition, when you apply for a job or position with us, we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide



information to us to assist in our decision on whether to make you an offer of employment or engage you under a contract.

This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

### **Why do we collect, use and disclose personal information?**

Our handling of your personal information will vary depending upon how you engage with us. We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to make a reservation or booking at a venue or accommodation property;
- to provide you with our goods and services at a venue;
- to respond to your enquiry or otherwise send you information which you request;
- to allow you to register to use one of our websites;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners;
- to administer competitions or other promotional activities or events sponsored or managed by us or our business partners;
- to operate, protect, improve and optimise our website, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- to consider your employment application.

We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop consumer insights so that we can better understand your preferences and interests.

### **Our use of your information**

Generally, information which you give to us is used to provide you with a product or service which you have requested from us. We will not use your information to market to you unless we have your implied or express consent. For example, if you enquired about our venues or entered a promotion in relation to our venues or products, we may infer your consent to receive marketing materials about those venues and services, or other venues and services which we think you may be interested in. If you receive electronic communications from us, we will always provide you with an opportunity to unsubscribe from receiving further information from us by emailing [privacy@starhotels.com.au](mailto:privacy@starhotels.com.au)

### **To whom do we disclose your information?**

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including booking websites in connection with providing our services to you); professional advisers, dealers and agents; our existing or



potential agents, business partners or partners; our sponsors or promoters of any competition that we conduct via our services; anyone to whom our assets or businesses (or any part of them) are transferred; specific third parties authorised by you to receive information held by us; and/or other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law. A Loyalty Program that specialises in membership to give the best experience to our members for Loyalty at our venues.

### **Do we disclose your information overseas?**

We may disclose your personal information to third party suppliers and service providers that have electronic storage located overseas that assist us to do business or often allow us to use the best hardware services for hosting.

### **How do we hold your personal information?**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference, and loss, as well as unauthorised access, modification or disclosure and we use several physical, administrative, personnel and technical measures to protect your personal information. For example:

Access to your personal information is restricted to our existing agents, business partners and service providers with authorised credentials. Copies of correspondence sent from the web site, that may contain personal information, are stored as archives for record-keeping and back-up purposes only and accessible only by authorised existing agents, business partners and service providers

However, we cannot guarantee the security of your personal information.

### **Using our website and cookies**

Our web servers gather your IP address to assist with the diagnosis of problems or support issues with our services. We use cookies to provide you with a better experience. Cookies are small files that store information on your computer, TV, mobile phone or other device. These cookies allow us to increase your security by storing your session ID and are a way of monitoring single user access. This aggregated, non-personal information is collated and provided to us to assist in analysing the usage of the site. You can disable cookies through your internet browser, but our websites may not work as intended for you if you do so.

### **Links**

Our websites may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.



### **How can you access or correct your personal information?**

You can access the personal information we hold about you by emailing our **Privacy Officer** below. Sometimes, we may not be able to provide you with access to all your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information, we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

### **Changes to Privacy Policy**

Privacy Policy can be changed or modified from time to time by star hotels and will be published 2 weeks before any changes are made active to [<insert privacy policy link>](#).

### **How do you make a complaint?**

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us by emailing our **Privacy Officer** below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

For more information about privacy issues in Australia and protecting your privacy, visit the Office of the Australian Information Commissioner's website, available [here](#).

#### **Privacy Officer**

Emily Muller

[privacy@starhotels.com.au](mailto:privacy@starhotels.com.au)

Star Hotel Group

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