



M I L E S T O N E

LEICHHARDT

PRIVACY POLICY

November 2019

The Milestone Hotel Leichhardt website collects some personal information from its users. Your privacy is very important to us and we want to ensure any information is safe and secure. This policy sets out how we collect, use, disclose and hold personal information.

Our Privacy Commitment

We respect your right to privacy, and we aim to ensure you have a trustworthy experience with us, including when using our website, visiting our venue and booking with us.

We are committed to complying with our obligations under the *Privacy Act 1988 (Cth)* (**Privacy Act**) by protecting the privacy and confidentiality of your personal information.

When we collect, use, disclose, store, access or correct your personal information, our actions will comply with the Privacy Act and the *Australian Privacy Principles*.

Where appropriate, we will handle your personal information relying on the employee records exemption and the related bodies corporate exemption in the Privacy Act.

Your Consent

By using this site, you consent to the collection and use of your personal information by Milestone Hotel Leichhardt in the manner set out in our Privacy Policy. By using our website and our social media channels, posting comments about us in any forum, providing any personal information to us, making enquires with us, visiting our venue, or booking with us, you confirm that you agree to and consent to the terms of this Privacy Policy and our collection and use of your personal information, to the extent that your consent is required by any applicable law.

If we decide to change our Privacy Policy, we will post those changes on this page so that you are always aware of our current practices in respect of the information we collect, how we use it, and under what circumstances we disclose it.

Personal Information Collected and Held

We collect and hold a wide range of personal information, and in some cases sensitive information, which may include the following:

- your personal details, including your full name, phone number, residential address, email address, other contact details, date of birth and occupation;
- information related to your entry to the Hotel's premises;
- a photo of you;
- details of your attendance at the Hotel, including any complaints made by you or against you in connection with the Hotel;

- information about what goods or services you buy or receive from the Hotel;
- details of your activities at or in connection with the Hotel;
- information related to your use of our Wi-Fi from any of your personal devices;
- images or videos of you at the Hotel's premises.

From time to time, we may collect additional information about you related to surveys, promotions and particular services or activities at or in connection with the Hotel. Wherever practicable, we will advise you of the information being collected about you and provide you with an opportunity to refuse the collection of that information.

Collection of Personal Information

Your personal information is collected as a result of your visits to our website or other dealings with the Hotel. Information is collected by recording information that you provide to us, by electronic means, and by the observations of our staff. We may collect personal information when you:

- enter, visit or deal with the Hotel;
- purchase goods or services from us;
- access or use our Wi-Fi from any of your personal devices;
- attend a function at the Hotel's premises;
- plan an event to be held with us;
- participate in activities offered by the Hotel, including competitions and promotions;
- visit our website or social media pages operated by the Hotel;
- leave a business card at the Hotel;
- are suspended, banned or removed from any part of the Hotel premises;
- are involved in, witness or are connected to an incident or disciplinary proceeding at or in connection with the Hotel.

In general, if you contact us, we may keep a record of that correspondence.

We only collect personal information about you directly from you, unless it is unreasonable or impractical to do so. For example, it may be unreasonable or impractical to collect information from you when the information is provided by other customers, our staff or the Police.

Notification on Collection of Personal Information

When we collect information from you, we will take reasonable steps to notify you (or otherwise ensure that you are aware) of the following:

- our identity and contact details;
- the facts and circumstances of the collection;
- details of any laws that require or authorise the collection;
- the purposes of collection;
- the consequences if we do not collect the information;
- that this policy contains information about how you can access or correct your information or make a complaint about the Hotel; and
- whether we are likely to disclose the information overseas (and, if so, to which countries).

The way we notify you of the above is by making you aware of this policy.

If you give us personal information about others, we expect that you will tell them about this policy.

Purposes of Collecting, Holding, Using and Disclosing Personal Information

We collect, hold, use and disclose your personal information to carry out certain activities, provide products and services to you and other customers, and comply with our legal obligations. The purpose of collecting your personal information is to undertake one or more of the following activities or functions:

- provide a safe environment for you, other customers and our staff;
- provide services to you and other customers;
- provide Wi-Fi at the Hotel;
- provide an events management service;
- operate functions at our venue;
- carry out competitions and promotions;
- publish and distribute newsletters;
- carry out marketing (including direct marketing);
- offer and manage sponsorships including by supporting community sports and social events;
- offer dining options and other entertainment;
- resolve a complaint;
- assess an applicant's suitability for employment; and
- improve our services of the Hotel.

Use of Personal Information

We use your personal information primarily to allow us to carry out the activities and functions listed above. We also use your personal information for secondary purposes related to those activities and functions, or when permitted under the Privacy Act.

The Hotel may also use the personal information we collect from you for direct marketing of products and services to you, including from third parties. Such products and services may include the provision of newsletters, competitions, announcements, campaigns or information about entertainment at the Hotel or services offered by the Hotel.

You can refuse any direct marketing by contacting our Privacy Officer.

Disclosure of Personal Information to Others

There may be times when we may need to disclose your personal information to third parties that we engage to provide services to or in connection with the Hotel, including our related entities, our insurers, our legal or financial advisers.

Your personal information will only be disclosed to third parties for a purpose permitted by the Privacy Act and/or this policy and, where required, after obtaining your consent.

We may need to disclose your personal information to third parties for the purposes of allowing us to carry out the activities and functions mentioned in this policy.

For example, from time to time, the Hotel engages external companies to send direct marketing information (usually via email or SMS), carry out mail services, and provide IT storage and other services.

A third party service provider will only receive your personal information from the Hotel where that information is necessary for that third party to provide services to or in connection with the Hotel and the Hotel will always require that the third party comply with the Privacy Act when dealing with your personal information.

We will also disclose your personal information to third parties if we are required or authorised to do so by law, including (but not limited to) law enforcement agencies, the Office of the Australian Information Commissioner, the Australian Electoral Commission, the Department of Family and Community Services and the Australian Taxation Office.

FREQUENTLY ASKED QUESTIONS

Is there surveillance at the Hotel?

The Hotel's premises may be subject to video and audio surveillance for security reasons, including to monitor the safety of customers and employees and to protect the Hotel's assets. The footage and audio recordings may be used in disciplinary proceedings and/or to investigate incidents and may be disclosed to our legal representatives, our insurers and law enforcements agencies.

How do we hold and protect your personal information?

Personal information that is held by us is stored electronically and/or in hardcopy.

We take reasonable steps to ensure that your personal information is safe and secure from unauthorised access, use or disclosure.

Information that we store electronically is held in secure and password protected databases.

Video and audio surveillance may be stored on our digital recorders, which are maintained in a restricted access area and password protected.

Your personal information is securely destroyed when it is no longer needed or when it is out of date.

What happens if my personal information is involved in a data breach?

The Hotel has various security measures in place to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

In the unlikely event that the Hotel's security measures are compromised, and your information is the subject of a notifiable data breach, the Hotel will comply with its obligations for responding to data breaches outlined in the Privacy Act.

Upon becoming aware of a notifiable data breach, the Hotel will take urgent steps to contain the breach, mitigate any risk of harm and determine who may have been affected.

The Hotel will then assess the breach, including any potential for harm, and determine whether the breach is likely to result in serious harm to any person whose data was involved.

If the Hotel has reasonable grounds to believe that the breach is likely to result in serious harm to you, the Hotel will notify you of the breach as soon as possible. The Hotel will also notify the Office of the Australian Information Commissioner.

Following a breach, the Hotel will conduct a review of its security measures and implement any additional measures it considers necessary to enhance the security of your information.

Are we likely to disclose personal information overseas?

It is unlikely that we will disclose your personal information overseas. However, if you agree to information being put on our websites or social media pages then this could be accessed by other countries.

We occasionally use secure cloud servers. This involves the use of servers that may be located in other countries and may constitute a disclosure under the Privacy Act.

Using the Hotel's websites and social media sites

The websites and social media pages operated by or in connection with us may collect personal information for the purposes outlined in this policy.

Any information collected by us as a result of your use of those websites and pages will be handled in accordance with this policy.

Those websites and pages may also use cookies and contain hyperlinks to other websites and pages, including those operated by third parties.

Any hyperlinks are provided for reference only. We do not have control over websites and pages operated by third parties and are not responsible for the content available on such websites or pages or the privacy practices of those third parties.

What does this policy mean?

By entering, visiting or dealing with the Hotel, you consent to the terms of this policy.

From time to time, your additional consent will be sought for the collection, use or disclosure of your personal information for purposes other than as set out in this policy.

If you do not agree to this policy or do not wish to receive direct marketing information from or in connection with the Hotel, please contact our Privacy Officer.

How do I access, update or correct the personal information held by the Hotel about me?

You can request access to the personal information we hold about you by contacting our Privacy Officer.

We will not charge you for making the request. However, we may need to charge you for our time to answer your request. We will advise you in advance if there are to be any charges associated with complying with your request.

We will respond to your request within a reasonable timeframe (usually not more than 30 days).

When you request access, we may need further information from you to verify your identity.

There are a number of reasons why we may be unable to give you access to your personal information held by the Hotel. If we are not able to provide access, we will provide you with written reasons.

If you believe any of the personal information that we hold about you is incorrect, you can ask us to correct it and we will take reasonable steps to ensure that it is accurate, up-to-date, relevant and not misleading. To assist us to update your information, we may need you to provide us with evidence of your new details.

If we refuse to correct your personal information, we will give you written reasons.

How do I make a complaint about privacy related to the Hotel?

If you believe we have breached the Privacy Act or any of the *Australian Privacy Principles*, or if you have any issues about the Hotel's collection, use, disclosure or storage of your personal information, please contact our Privacy Officer.

When contacting our Privacy Officer, please give us enough details to be able to identify you, understand your issue or complaint and respond appropriately.

We will respond to you within a reasonable timeframe (usually not more than 30 days).

If you are unhappy with how we handle your issue or complaint, you are entitled to make a privacy complaint to the Office of the Australian Information Commissioner.

How do I contact the Privacy Officer at the Hotel?

You can contact the Privacy Officer as follows:

- Phone: (02) 9569 4057
- Email: leichhardt@milestonehotels.com.au
- Post: 140 Marion Street, LEICHHARDT NSW 2040

How do I contact the Office of the Australian Information Commissioner?

Please visit the Office of the Australian Information Commissioner's website at <http://www.oaic.gov.au/> for contact details.