

# PRIVACY POLICY

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## What is covered by this privacy policy?

This Privacy Policy outlines our personal information management practices, including how we collect, hold, secure, use and share your personal information. Specifically:

- The kinds of personal information we collect and hold
- How we collect and hold it
- The purposes for which we collect, hold, and use it
- How we secure it
- How, and to whom, we share your personal information with
- Your right to access and correct it.
- How you may contact us if you wish to make a complaint or enquire about privacy matters.
- There are some matters to which this policy does not apply.

## What is personal information?

As defined by the Privacy Act 1988, "personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

Whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

Any time we use the term "personal information" in this policy, we are referring to this definition of the term.

We always want to provide you with the highest level of service, so we collect and hold personal information necessary for our business activities and to enable us to provide the information, goods, or services you might be looking for. If we do not collect the information, we may not be able to provide these things.

We collect your personal information directly from you when you activate or use our services, interact with us, either in person, over the telephone or electronically (e.g. via websites, apps, social media posts, chats, telephone, emails and/or SMS) or as otherwise required by law

For example:

Your contact details including your name, email addresses, telephone numbers, residential and delivery addresses.

Your loyalty card number; or an electronic copy of the written communication or voice recording of the conversation (we always let you know when your conversations with us will be recorded).

Below are some examples of personal information we may collect from you and how we collect that information:

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When you register to participate in one of our loyalty programs or when you use your loyalty card;

- Your contact details.
- Date of birth and gender.
- Your card and transaction details.
- Information about purchases for which you earn loyalty points as well as your use of those loyalty points.
- Your contact details and loyalty card number
- Information about your orders and purchases, including what, how, and when you buy from us, how you paid for purchases (including payment card details and transaction details)
- We may ask for your ID, such as your driver's licence, if you purchase alcohol or tobacco or other forms of identification so that you can use certain services we provide.
- Whether you have taken up or subscribed to any of our offerings such as loyalty programs
- Information collected and held via our secure financial systems about the payment method you use for your purchases from us.
- When you contact us or we contact you to take part in competitions, promotions, testimonials, reviews, surveys or make other enquiries.
- Your contact details and loyalty card number
- Whether you activated the promotion
- The content of online communications with you, including competitions, promotions, feedback, reviews, ratings, comments and images included on any of our websites, apps or social media pages or any of our other digital services
- An electronic copy of the written communication or voice recording of the conversation.

## When you visit us in person, including for events

Your contact details, your ID, and loyalty card number for in-store/in-hotel services such as pick up.

We may ask for your ID, such as your driver's licence, if you purchase alcohol or tobacco;

Cameras (including security and smart cameras) may record footage and other data which may identify you; or your contact details if security or team members are investigating whether you may have breached any procedures or if you are injured in our venue or are witness to an incident.

From time to time we may also collect personal information about you from other sources to help us supplement our records, improve the personalisation of our service to you, manage our services, and detect fraud.

For example, we may collect personal information from:

State Governments for the purpose of exclusion from alcohol or gaming venues.

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## Do I have to provide my name?

For many of our services, you generally have the option not to give us your name and can use a pseudonym if you prefer. We may need your real name and a valid ID for specific purposes or where we are required to ask by law.

## Can I provide someone else's personal information?

Yes, you may provide someone else's personal information to us, for example,

- When you purchase a gift for others
- Place an order on someone else's behalf
- When you open a Loyalty Program account on someone else's behalf.

You must have their consent beforehand and we may ask you to provide evidence of that consent. You should not provide someone else's information if you don't have their consent, or for malicious purposes.

## Do you collect sensitive information?

Some of our products and services may require us to collect your "sensitive information" (which is defined in the Privacy Act and is a subset of 'personal information') from you or from other sources. Sensitive information is only obtained with your consent or in certain limited permitted situations.

## How do you secure my sensitive information?

Your personal information is important to us. We design our systems with your security and privacy in mind.

Any personal information we hold is generally stored electronically in computers or cloud systems operated by us or by our service providers. We implement a range of information security measures and encryption protocols when we handle your personal information to protect it from unauthorised access, loss, misuse or wrongful alteration.

We may collect information from your current device using cookies or other technologies, including your online browsers or apps to protect your account security.

We use security measures such as physical and technical security access controls or other safeguards, information security technologies, policies, procedures and training programs to ensure the security of your personal information.

We protect your payment card details with encryption and hashing methods. Do not include your full card details when you communicate with us via email, SMS or chat messages. If we have to make a reference to your payment card number, we will only refer to the last four digits in any form of written communications.

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## For what purposes does Helensvale Tavern hold my information?

We primarily collect, hold and use your personal information to supply, promote and sell goods and services that you have requested, or which may be of interest to you, so that we can improve and personalise your experiences. This may also include the products and services of our suppliers and trusted partners. Helensvale Tavern also collects, holds, and uses your personal information to meet legal requirements that Helensvale Tavern is required to follow.

We may use your personal information for purposes which are incidental to the sale and promotion of our goods and services, or for other purposes which are within your reasonable expectation or permitted by law.

In addition, your personal information may be used for the following purposes:

### Personalisation:

To identify your preferences, to recommend features, products, and services that may be of interest to you, and to personalise your experience with Helensvale Tavern.

Communication: To send you offers and other communications that may be of interest to you.

Create and maintain your loyalty account: To capture and reward your shopping behaviour, and to provide customer support if needed.

### Investigation:

To assist in responding to your complaints or enquiries and to undertake investigations.

### Fraud detection and security:

To verify your identity and to detect fraud activities. We may conduct auditing and monitoring of transactions and financial engagement.

Improve our services and customer experience: To analyse performance, improve our systems and improve the usability, functionality and effectiveness of our services.

### Analysis:

To analyse your personal information in an anonymised and combined way when we communicate with you about your preferences and interaction with Helensvale Tavern; for example weekly personalised specials.

### Legal Requirements:

To comply with legal requirements including licensing and reporting obligations, Helensvale Tavern must collect and hold your personal information.

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## Who does Helensvale Tavern share my information with?

Your personal information is important to us and we are very focused on making sure it stays safe.

We use data, including personal information in some cases, to understand the preferences and shopping patterns of our customers and to produce other insights. In most cases, we employ techniques such as grouping, combining, and anonymising, so that we don't need to use your personal information to understand those preferences or patterns, or to produce insights.

We may also share anonymised preferences and insights with our suppliers, partners and service providers to assist with the marketing of products and services, without revealing your personal information.

There are limited circumstances when we do need to share or use your personal information, such as:

- When you make a written request to share your information with a third party;
- To related companies;
- For fraud detection and security protection
- When legally required, including assisting with police investigations, and where required by law enforcement agencies.
- With third parties, such as partners, suppliers, or service providers, when we need their assistance in our day-to-day business operations or so we can work with them to provide services to you.

There are also limited circumstances in which we may share your personal information with third parties, such as:

- Financial services organisations or specialised service providers for fraud detection (when we process your payments)
- Print partners for direct mail and card fulfilment (when you register and order a loyalty card from us)
- Expert data partners (in encrypted form) to provide us with insights (when you shop with us or when you join our loyalty programs).

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## Marketing communications

When you register to hold an account or become a member of Helensvale Tavern program, we may send you commercial electronic messages and tailored advertising if you agree to let us do so. We may send you these messages via various channels and media (including by email, SMS, phone and mail, or via advertising on certain websites and social media), but only where you have not opted out of receiving such electronic messages from Helensvale Tavern in that channel.

You can opt out of commercial electronic messages by using the relevant unsubscribe facility for Helensvale Tavern which sent the message. The appropriate unsubscribe facility may depend on the subject of the message or the channel used to send the message. Details on how to opt out of commercial electronic messages in relation to Helensvale Tavern are contained within the terms and conditions.

## How can I access my information?

You have a right to request access to the personal information we hold about you. You can access or correct your personal information in venue at Helensvale Tavern by a Licensed manager.

However, before we provide you with access to your personal information, we may require verification of proof of identity. There is no charge to submit a request to correct or access your personal information, however, we may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

If you would like a copy of the personal information held by us about you, please contact Helensvale Tavern directly.

## How can I correct my information?

If you believe that any of your personal information is inaccurate, out of date, incomplete, irrelevant or misleading, please contact Helensvale Tavern directly. It is your right to have your personal information corrected.

## How will I know if Helensvale Tavern changes their privacy policy?

This Privacy Policy is current from January 2023. We may change it periodically. If we propose to change this policy, we will display the proposed policy on <http://helensvaletavern.com.au> at least 2 weeks before any change comes into effect.