Privacy Policy

Bel Boa Pty Ltd ACN 008 572 450 trading as the Statesman Hotel (referred to in this policy as the "Statesman Hotel" and also "we" and "us") is committed to providing quality services to you and this policy outlines how we manage personal information.

The Policy relates to personal information collected by any means and by any technology, including but not limited to via its website at https://statesmanhotel.com.au.

We treat the handling of your personal information very seriously. We abide by the Australian Privacy Principles, which provide a scheme in relation to the collection, disclosure, use and storage of personal information. The Statesman Hotel's objective is to handle information responsibly and provide you with some control over the way information about you is handled.

What is Personal Information and why do we collect it?

Personal information is information or an opinion that identifies an individual. Examples of personal information we collect about you may include:

- Your full name and your personal contact details (such as your home address, your postal address, your phone number and email address);
- Your credit card number;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- Your feedback, opinions and comments provided to us whilst using our website or during your stay or using our services;
- User uploaded images, such as your identification card, if provided, when checking-in via our digital check in process;
- additional personal information that you provide to us, directly or indirectly, through your
 use of our website, associated applications, associated social media platforms and/or
 accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

If possible and reasonably practical you will have the option of not identifying yourself or using a pseudonym in providing such information. However, if you do not identify yourself, we may not be able to give you the information and services that you would otherwise receive.

We may collect this personal information from you and third parties.

You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

We do not deliberately collect or record sensitive information.

However, at times we may be required to collect sensitive information to meet your requirements e.g. in terms of advising on suitability of rooms if you have accessibility requirements and/or to meet your dietary requirements.

Collection of Personal Information

Personal information may be collected on a variety of occasions, including from directly from you and or from third parties such as:

- 1. When you arrange to stay at our hotel or participate in hospitality activities or functions:
 - When you make an accommodation booking at the hotel or book a function or make a reservation at our restaurant or bar;
 - When you check in for your stay or attend events at the hotel;
 - When you pay for accommodation or our other services;
 - When you eat or drink at our café, restaurant or bar or use our other services;
 - When you sign up for loyalty or marketing programs; or
 - When you provide comments or feedback on your experience at the hotel or about our other services.
- 2. From third parties such as:
 - Travel agencies (including online travel agencies and booking sites where you have booked with a third party).
- 3. Internet activities such as:
 - When you connect and interact with our website (IP address, cookies); or
 - When you interact with our social media accounts or complete online feedback forms.

Personal information is collected for the purposes of arranging, conducting and promoting our business activities.

We do not collect personal information unless it is reasonably necessary for us to perform one or more of our functions or business activities.

Use and Disclosure of Personal Information

We will use and disclose your personal information for the purpose for which the personal information was collected.

We may also use that personal information for a purpose related to the initial purpose of collection if that purpose would be within your reasonable expectations. Related purposes might include internal auditing, compliance, administration, record keeping, adding your name to a contact list, guest list or invitation list or helping us to identify can promote business activities or investment opportunities that might be of benefit or interest to you.

We may use and disclose your personal information to

- our employees and directors, contractors, and/or related entities;
- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, marketing or advertising providers, professional advisors, insurers and payment systems operators;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you;
- our existing or potential agents or business partners;
- sponsors or promoters of any competition, sweepstakes, or promotion we run;
- third parties to collect and process data such as Google Analytics, RMSCloud data etc

• an entity that buys, or to which we transfer all or substantially all of our assets and business.

Like most business organisations, we rely on third party suppliers who are contracted to conduct specialised activities such as insurance broking, supply of equipment, provision of professional business services, IT providers and data processes, security, housekeeping and hospitality services. While personal information may be provided to these suppliers in order to enable them to perform the agreed tasks, we will make reasonable efforts to ensure the supplier handles information in accordance with the Australian Privacy Principles and confidentiality principles.

Generally, we will retain your personal data within Australian and not use or disclose it overseas. However, on some occasions the information may be transferred overseas in order to perform our business functions or activities.

By providing us with personal information, you consent to the disclosure of your personal information to third parties and acknowledge that we are not required to ensure that those third parties comply with Australian privacy laws.

We may also be obliged to disclose your personal information without your consent if the disclosure is:

- required or authorised by law;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

Security of Personal Information

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification.

Your personal information may be stored in hard copy documents, or electronically on our software or systems.

Although we will do our best to protect the personal information you provide to us, we advise that no means of electronic transmission or storage is 100% secure and no one can guarantee absolute data security.

When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most of the personal information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Access to your Personal Information

You may access the personal information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your personal information, please contact us in writing.

We will acknowledge your request to access your personal information within 14 days and will endeavour to provide access within 30 days or otherwise a reasonable period the request (in such instances we will communicate with you about an achievable timeframe).

We will not charge any fee for your access request unless the request for access is onerous or time consuming – such a fee will cover staff costs involved in locating and collating information. We may also charge you for administration and copying costs if you seek copies of your personal information.

In order to protect your personal information we may require identification from you before releasing the requested information.

Depending on the circumstances we will make all reasonable attempts to provide access in the manner requested. If the manner requested is not reasonable you may be forwarded the information by another means reasonable in the circumstances, for example by mail or email or by requiring you to personally inspect the records at an appropriate place.

In some circumstances, we may not be in a position to provide access. Such circumstances include where:

- access would create a serious threat to safety;
- providing access will have an unreasonable impact upon the privacy of other individuals;
- · denying access is required or authorised by law;
- the request is frivolous or vexatious;
- legal proceedings are underway or otherwise anticipated;
- negotiations may be prejudiced by such access; or
- access would reveal a commercially sensitive decision making process.

If we deny access to your personal information, we will provide you with reasons in writing.

Maintaining the Quality of your Personal Information

It is an important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us in writing so we can take steps to update our records and ensure we can continue to provide quality services to you.

Cookies

We may use "cookies" to collect information about you and your activity across the website. A cookie is a small piece of data that the website stores on your computer, and accesses each time you visit, so we can understand how you use our site. This helps us serve you content based on preferences you have specified. Please refer to out Cookie Policy when you access our website for more information.

Your Acceptance of These Terms

By using our website or accessing our services, you signify your acceptance of this policy and terms of service. If you do not agree to our privacy policy, please do not use our site. Your continued use of the website following the posting of changes to this policy will be deemed your acceptance of those changes.

Policy Updates

This policy may change from time to time and is available on our website.

Contact Us

If you have any queries or complaints about our privacy policy please contact us at:

Statesman Hotel, 14 Theodore Street Curtin, ACT 2605

E: hello@statesmanhotel.com.au

P: +61 2 6281 1777