



Swan River Hotel

Privacy Policy

(Updated: September 2022)

Swan River Hotel values and respects the privacy of the people we deal with. Swan River Hotel is committed to protecting your privacy and complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) and other applicable privacy laws and regulations.

This Privacy Policy (**Policy**) describes how we collect, hold, use and disclose your personal information, and how the quality and security of your personal information is maintained.

What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

What personal information do we collect?

The personal information we collect about you may include your name, mailing or street address, date of birth, email address, phone number, billing information, information about your engagement with us, such as how you access our website.

By providing your consent for us to use your personal information, you agree that we may use your personal information in accordance with this Privacy Policy. You do not have to provide your consent but that may mean that we may not be able to provide you with our services or otherwise interact with you.

How do we collect your personal information?

We collect your personal information directly from you when you:

- (a) purchase products or services from us at our venue or through our website or mobile applications (e.g. book accommodation);
- (b) interact with us over the phone;
- (c) interact with us in person;
- (d) interact with us online;
- (e) submit feedback, a query or request to us;
- (f) fill in forms on our website or at our venue;
- (g) check-in at our venue;
- (h) attend our venue (through our CCTV system at the venue);
- (i) visit our website, including by tracking your use of website or mobile applications;

- (j) access or use our Wi-fi portals owned or operated by us;
- (k) participate in surveys or questionnaires;
- (l) subscribe to our mailing list; and
- (m) apply for a job with us.

Collecting personal information from third parties

We may also collect your personal information through publicly available sources or from third parties, who are entitled to disclose that information to us (including travel agents, third party booking websites, etc.).

How do we use your personal information?

We use personal information for many purposes in connection with our functions and activities, including the following purposes:

- (a) provide you with information or services that you request from us;
- (b) deliver to you a more personalised experience and service offering;
- (c) improve the quality of the services we offer;
- (d) internal administrative purposes, including for education and training programs for our staff;
- (e) marketing and research purposes;
- (f) to answer your feedback, queries or requests;
- (g) by providing it to our payment processing provider so they can:
 - i. improve the payment processing services they provide to us and to you, including by developing fraud detection and prevention tools;
 - ii. monitor, prevent, and detect fraudulent payment transactions;
 - iii. comply with legal or regulatory obligations applicable to the payment processing services they provide, including applicable anti-money laundering and identity verification obligations, or to assist law enforcement agencies by responding to requests for information;
 - iv. analyse, develop and improve their products and services;
 - v. perform data analysis; and
 - vi. de-identify and aggregate payment transaction data for the purpose of statistical analysis of payments by region or industry;
- (h) monitor use of our products and services (including our website or mobile applications);
- (i) manage and resolve any legal or commercial complaints or disputes; and
- (j) comply with any legal or regulatory obligations under any law, regulation or Federal or State government order or direction or state of emergency.

Disclosure of personal information to third parties

We may disclose your personal information to third parties in accordance with this Policy in circumstances where you would reasonably expect us to disclose your information. For example, we may disclose your personal information to:

- (a) our staff who require the information to discharge their duties;
- (b) our third party service providers (for example, our information technology service providers, payment system operators (including banks and financial institutions), data hosting and processing companies, data and research (marketing) companies, fraud detection, prevention and security service providers, etc);

- (c) representatives, advisers or other persons whom you have authorised to interact with us on your behalf;
- (d) professional advisers who we engaged to provide legal or business advice to us;
- (e) comply with our legal and regulatory obligations, and as otherwise required by law.

Transfer of personal information overseas

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia, such as in New Zealand, Hong Kong, Singapore, Canada, and the United States of America.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained.

How do we protect your personal information?

Swan River Hotel will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- (a) having a robust physical security of our premises and databases/records;
- (b) taking measures to restrict access to only personnel who need that personal information to effectively provide services to you; and
- (c) having technological measures in place (for example, anti-virus software, fire walls).

Cookies

The Swan River Hotel website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and the Swan River Hotel website(s).

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our website uses analytic tools to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, website personalisation, and to provide targeted or retargeted advertising content to you (including through third party websites).

Retention of personal information

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

How to access and collect your personal information

Swan River Hotel will endeavour to keep your personal information accurate, complete and up to date.

If you wish to make a request to access and/or correct the personal information we hold about you, you should make a request by contacting us. We will deal with such a request within a reasonable time and keep you informed as to the progress or your request.

Links to third party sites

Swan River Hotel website(s) may contain links to websites operated by third parties. If you access a third party website through our website(s), personal information may be collected by that third party website. We make no representations or warranties in relation to the privacy practices of any third party provider or website and we are not responsible for the privacy policies or the content of any third party provider or website. Third party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.

Inquiries and complaints

For complaints about how Swan River Hotel handles, processes or manages your personal information, please contact us. Note we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 14 days for Swan River Hotel to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with Swan River Hotel's response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

Email: manager@swanriverhotel.com.au

Post: Attention: Manager
Swan River Hotel
1 Epsom Avenue
ASCOT WA 6104