

ZAGAME'S HOTELS – PRIVACY POLICY

Policy last updated: [01/04/2019]

Zagame's Hotels (the **Venues**) understands that privacy is important to you and wants your experience with us to be as enjoyable and safe as possible. This policy describes how the Venues collect, store, use, disclose, protect and otherwise handle your personal information generally and when you use the Zagame's Hotels website (**Site**), having regard to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

This policy does not constitute a contractual representation, promise, guarantee or warranty by the Venues to you as to the manner in which the Venues will or may collect, store, use, disclose, protect or otherwise handle your personal information. Some matters are beyond the control of the Venues, such as third party malicious or criminal attacks.

The Venues may allow its related entities, such as its subsidiaries, and their employees, to use and process your personal information in the same way and to the same extent that the Venues are permitted to under this policy. These related entities comply with the same obligations that the Venues have to protect your personal information under this policy.

What is personal information?

Personal information is information or an opinion about you from which you can be reasonably identified.

What personal information is collected and how is it collected?

If it is reasonable and practical do to so, the Venues will collect personal information directly from you. Depending on how you choose to interact with the Venues, the Venues may collect your personal information when you contact, or are contacted by, the Venues or its service providers by telephone, by email, through the Site (including subscription and booking forms), apps, social media and other digital services, via response devices or when you complete a form or document and provide it to the Venues. Depending on the service you are accessing, you could be asked at various times to provide personal information including, but not limited to, details such as your name, telephone number, e-mail address, information about what you like and do not like and other information you provide to us.

The Venues may also collect information about you from other people (e.g. a third party administrator) or independent sources. For example, the Venues may collect personal information about you from its service providers, including the operators of third party booking websites. However, the Venues will only do so where it is not reasonable and practicable to collect the information from you directly. Where the Venues have collected your information from a third party, such personal information will be held, used and disclosed by the Venues in accordance with this policy.

When booking table reservations online or paying for other services, we may also request your credit card number to complete the transaction, or your mailing address to ensure delivery. Credit card details are required to confirm accommodation and we use EPOS to securely process transactions.

The Venues will not collect sensitive information about you, such as details of your race, political beliefs, religion or health unless this is required where we are providing you with specialised services (such as access requirements for a disability). The Venues will only use sensitive information:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose;
- (c) with your consent; or
- (d) where required or authorised by law.

If the Venues receives personal information that it has not requested and determines that the personal information received is not reasonably necessary to provide its services, the Venues will take all lawful and reasonable steps (if any) to de-identify or destroy that personal information.

When you provide the Venues with personal information, you consent to the use, disclosure and handling of your personal information in accordance with this policy and any subsequent amendments.

Why does the Venues collect personal information?

We need to collect this personal information in order to provide you with our products or services and a broad range of information in relation to tourism, hospitality and services and to assist us in delivering a better service to you.

How does the Venues hold your personal information?

Security generally

The security of your personal information is important to the Venues. Accordingly, the Venues take reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification or disclosure. These steps include the implementation of the following safeguards:

- password protected databases, staff training, system firewalls, internal information security policies

The Venues will take reasonable steps to permanently de-identify or responsibly destroy personal information if it is no longer needed for the purpose for which the information was used or disclosed.

Security breach procedures

The Venues data security practices have been adopted with a view to protecting the data held by the Venues. Notwithstanding this, individuals should be aware that there are inherent risks associated with the transmission of data over the internet and other mediums. Accordingly, the Venues cannot guarantee any transmission will be completely secure.

Use of personal information

The Venues may hold, use or disclose your personal information to provide you with, improve and personalise our services and to assist in making your experience with the Venues a satisfying one.

Information is also collected to establish and maintain proper business records, for marketing and advertising purposes and to support the Venues business functions.

The Venues may also hold, use or disclose your personal information to:

- (a) consider any concern or complaint that you raise against the Venues or to manage any legal action between you and the Venues;
- (b) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct; and
- (c) comply with any relevant laws, regulations, codes of practice and court orders.

Direct marketing

Your personal information may also be used to notify you about new products, services or promotions from time to time.

At any time you may opt out of receiving direct marketing communications from the Venues via the method outlined below - see "Removal from our lists".

Unless and until you opt out of the Venues mailing list, your consent to receive direct marketing communications from the Venues and to the handling of your personal information for this purpose will continue.

Will your information be given to anyone else?

The Venues does not sell, rent or trade personal information to, or with third parties.

All personal information collected by the Venues is only made available to those authorised individuals who need to handle that information for the purposes outlined in this policy. In some circumstances, personal information may also be disclosed outside the Venues. For example, we may disclose personal information to third parties to whom the Venues contracts out specialised functions (such as mailing houses and printing companies), or to third parties for the purpose of completing your transaction with us (such as EPOS and your credit card provider). The Venues will also disclose personal information when required by law and may disclose it when reasonably necessary to assist an enforcement body or to lessen or prevent a threat to individual or public health or safety.

The Venues will not disclose your personal information to third parties who are overseas.

Change of control

If the Venues sells, assigns or otherwise transfers part or the whole of its business, your personal information, which was collected by the Venues may be among the items transferred or sold to the extent that it is relevant to the Venues business.

Use of cookies

The Site application uses cookies exclusively for session management, website administration, statistical and maintenance purposes. Cookies are small text files that are temporarily stored in the user's browser throughout the course of each individual session that serve to identify the user during each individual visit to the Site and to record non-personal information such as the date, time or duration of your visit and the pages accessed (**Cookie Information**). We use cookies to provide you with a more consistent experience across our services. No other use is or can be made of the information contained in these cookies, and there is no trace of individual sessions.

No attempt is made by the Hotel to use Cookie Information to personally identify you. However, if Cookie Information is linked with personal information as set out above, this Cookie Information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

You can remove or reject cookies by adjusting the settings on your web browser. Please note that some parts of the Site may not function fully for users that disable cookies.

External links on our Site

The Site contains links that will let you leave the Site. The use of information and/or privacy provided by the operator of a linked website as to any information you provide in accessing a linked website is in no way subject to this policy. The Hotel takes no responsibility for any privacy policies or practices of any websites accessible from the Site, whether or not such practices conform to privacy policies of those websites.

Removal from our lists

If you do not want to receive e-mail or posted offers from the Venues generally please let us know by sending an email message to contact@zagames.com.au or by contacting the Venues Privacy Officer using the contact details detailed below. If you want to be removed from our mailing list at any time, please provide the Hotel with your complete name and address, in writing. If you follow the instructions for "unsubscribe" included as part of the Venues regular email offers, your name will be removed from the mailing list.

Access and correction

You have a right to seek access to personal information which the Venues holds about you at any time (although there are some exceptions to this). You also have the right to ask us to correct personal information about you which is inaccurate, incomplete or out of date.

If you wish to exercise your right to seek access to, or correction of, your personal information held by this Venues, then please contact the Privacy Officer using the contact details detailed below. The Venues will respond to the request within a reasonable period after the request is made.

Please note that in the interests of protecting the privacy of all our customers, if you request details of any personal information held by us, we will need to identify you properly. To do this, we may telephone

you or require your current name and address (including any former addresses that may assist in identification) and a copy of a form of identification such as a current driver's licence or passport.

We will assume, unless you tell us otherwise, that your request relates to our current records about you. This will include the personal information about you which is held on our databases and files.

For legal and administrative reasons, the Hotel may also store records containing personal information in its archives. You may also seek access to these records held by the Venues which are not current records.

There is no charge to make a request, however we may charge you a reasonable fee to cover the administrative cost of retrieving your personal information.

In certain circumstances, the Venues may refuse, or be unable, to correct or provide you with access to your personal information. In these circumstances, the Venues will write to you to explain the reasons why this is the case.

How you may complain if you have concerns about how the Venues has managed your personal information

If you have a complaint related to how the Venues has managed your personal information, please contact the Venues using the contact details detailed below. The Venues may ask you to place your concerns in writing so that its compliance staff can fully understand and investigate your complaint.

The Venues will provide you with an estimated response timeframe in relation to your complaint. In any event, the Venues will endeavour to respond to your complaint with [30] days.

If a complaint remains unresolved, you may contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au to have the complaint heard and determined.

How to contact us

Zagame Corporation
Privacy Officer
Address Level 1, Suite B 290 Burwood Road
Hawthorn VIC 3122
Phone: 03 9819 8555
Email: contact@zagames.com.au

Changes to the Venues policy and information handling practices

This policy is subject to change at any time so we encourage you to review this policy at regular intervals. If the Venues changes this policy, an updated version will be posted on the Venue's website to notify you of this change. By continuing to use the Venue's services after that time you will be deemed to have accepted any changes to its policy.