

The Kent Town Hotel Privacy Policy

1. Respecting your privacy

The Kent Town Hotel is committed to compliance with privacy laws which apply to its businesses and which set out standards for the management of personal information. This policy outlines our personal information management practices. Specifically:

- the kinds of personal information we collect and hold;
- how we collect and hold it;
- the purposes for which we collect, hold, use and disclose it;
- your right to access and seek correction of it; and
- how you may complain about privacy matters.

There are some matters to which this policy does not apply. These are referred to below

(see clause 9 below).

2. What kinds of personal information do we collect and hold?

The personal information we collect and hold is what is reasonably necessary for our business functions and activities. When we collect and hold personal information, it is of the following kinds:

- your personal details such as your name, addresses, telephone numbers, age and gender;
- whether you have taken up some of our other offerings, such as event tickets, reservations, functions or competition entries;
- any rewards and redemption details applicable to your membership of our loyalty programs;
- what, how and when you click on links in our electronic direct mail outs
- your stated or likely preferences, for example whether you may be interested in particular products or promotions.

You generally have the option of not identifying yourself or of using a pseudonym when dealing with us. But not where this is impractical or where the law or a court order provides otherwise.

3. How do we collect and hold personal information?

Collection of personal information: When we collect personal information about you, we do so by making a record of it. We do this when:

- you register with us, for example to create an account, to become a member of one of our clubs or loyalty programs or to send you information;
- you communicate with us online;
- you take part in our promotions, competitions, testimonials, surveys and focus groups;

- you deal with us in other ways involving a need for personal information to be provided such as when you, contact the venue to make booking or enquiry.

We may also collect personal information about you by accessing data from other sources and then analysing that data together with the information we already hold about you in order to learn more about your likely preferences and interests. When you visit our websites, social media pages or mobile applications or click on our advertisements on the online media of other companies, we may collect information about you using technology which is not apparent to you.

Most of the personal information we collect and hold about you is from your direct dealings with us. We may sometimes collect your personal information other than from you directly. For example from other suppliers who, in common with us, have a relationship with you.

Holding of personal information: Personal information we hold is generally stored in computer systems. These may be operated by us or by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, misuse or wrongful alteration of, personal information.

4. Why do we collect, hold, use and disclose personal information?

When we collect, hold and use your personal information, we do so primarily to sell and promote our goods and services to you and to improve on the range of our offerings. For example:

- to learn of your likely preferences so that we may promote our goods and services to you in a way which may be of most interest to you; and
- to assist in investigating your complaints and enquiries.

We disclose personal information we collect for purposes which are incidental to the sale and promotion of our goods and services to you. For example, we may disclose your personal information within our group, to service providers who assist us in our day-to-day business operations and as part of buying or selling businesses.

We may collect, hold, use and disclose your personal information for other purposes which are within reasonable expectations or where permitted by law. When marketing to you, your personal information is only ever used or disclosed for The Kent Town's own purposes. You may opt out of our direct marketing to you. Our direct marketing materials will tell you how to do this.

We may de-identify your personal information. We may do this for use and disclosure of the anonymous data to determine preferences and purchase patterns.

5. How can you enquire about, access and correct your personal information?

Access: We will provide you with access to any of your personal information we hold (except in limited circumstances recognised by law). If you wish to access your personal information or have an enquiry about privacy, please contact our Administration staff at: admin@kenttownhotel.com.au or by calling us on 08 8362 2116

Alternatively, you can write to us at:

The Kent Town Hotel
76 Rundle Street

Kent Town SA 5067

Before we provide you with access to your personal information we may require some proof of identity. We may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

Correction: If you need to correct your personal information, please contact our Privacy Officer at one of the above contact points.

6. How can you complain about our management of personal information?

If you wish to complain about a breach of the privacy rules that bind us, you may contact our Administration staff at one of the above contact points. We may ask you to put your complaint in writing and to provide details about it. We may discuss your complaint with our personnel and our service providers and others as appropriate.

Our Administration staff will escalate and investigate the matter and attempt to resolve it in a timely way. Our Administration staff will inform you in writing about the outcome of the investigation. If our Administration staff does not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, our Administration staff will inform you that your complaint may be referred to the Privacy Commissioner for further investigation and will provide you with the Commissioner's contact details.

9. Updates

This privacy policy is current at the date below. We may change it periodically. If we propose to change this policy, we will display at least 2 weeks' prior notice of the change on www.kenttownhotel.com.au.

10. Other privacy terms and limits of this policy

This is a policy. There may be additional privacy notices and terms relevant to you depending on the nature of your dealings with us and on our particular businesses. This policy does not apply to the personal information of our employees in their capacity as such.

11. More information

More information about privacy law and privacy principles is available from the Privacy Commissioner. The Privacy Commissioner may be contacted at www.oaic.gov.au (email-enquiries@oaic.gov.au) (Australia).

Last update of this policy: March 2014

Last Reviewed: March 2016

Next Review: no later than March 2018