

*Frontier Hospitality Co-Operative Limited*

## **Privacy Policy**

Frontier Hospitality Co-Operative Limited ABN 37 038 925 939 and its related entities and affiliates (together, '**we**', '**our**' or '**us**') respects your personal information. Our Privacy Policy sets out how we treat your personal information.

### **1. Our Compliance with Privacy Legislation**

We are committed to protecting the personal information of all individuals and are bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) ("**the Act**"). We will only collect, use or disclose personal information in accordance with the Act and our Privacy Policy. Personal information is generally information or an opinion that can personally identify you.

### **2. How and Why We Collect Your Personal Information**

We will collect personal information from you directly and from your use of our products and services (including attendance at our venues) and through other means such as:

- administering and performing any of our services;
- telephone calls
- applying for or renewing membership or completing other forms;
- making an enquiry with us regarding membership or any of our services;
- conducting customer satisfaction and market research surveys;
- participating in any of our loyalty rewards programs;
- entering any promotions or competitions we run or subscribing to special offers;
- accessing our website.

We may also collect information about you that is publically available or from others, such as our related entities and third party service providers as well as through social media and the internet.

We only collect and use personal information that we consider necessary or desirable for us to carry out our many functions, including but not limited to:

- establishing your identity to assess applications you make to us;
- administering our products and services;
- managing our relationship with you;
- developing and improving our services;
- contacting you when it is important to do so;
- informing you about our products or services;
- marketing the products and services of any of our related entities; and
- complying with legal requests.

We may also collect information about you because there is a legal requirement to do so. Laws which concern the gaming and liquor industry and other related laws (such as Anti-Money Laundering and Counter Terrorism Financing laws) require the collection of personal information.

If you do not provide us with your personal information, we may not be able to provide you with the products or services you want or inform you about our other products or services.

### **3. Types of Personal Information We Collect from You**

We offer a range of hospitality experiences including but not limited to electronic gaming, dining and bars. Accordingly, the purpose and type of personal information which we may collect from you can vary depending on which hospitality experience you are involved in.

The types of personal information we may collect from you include the following:

- identification information such as your name, address and date of birth and copies of documents to confirm your personal information such as a driver's licence;
- contact details such as email addresses; phone and facsimile numbers;
- financial details such as your tax file number and credit card and banking details;
- information required to be included on registers pursuant to gaming, liquor laws and other related laws (such as Anti-Money Laundering and Counter Terrorism Financing laws).

### **4. How We Use and Disclose Your Personal Information**

We may use or disclose the personal information, other information or data we collect from you:

- for the purpose which was either specified or reasonably apparent at the time of collection.
- for other related purposes for which you would reasonably expect it to be used.

We may use your personal information to send you out promotional material, which you may find of interest. You may simply choose to "unsubscribe" from our mailing lists if you do not wish to receive any of this material.

We will not generally disclose personal information to third parties except:

- with your consent;
- to our related entities and agents;
- where we are required or authorised by law to do so; or
- where we consider that third party contractors require access to personal information to perform our services or provide our products on our behalf.

Any third parties and agents that are provided access to personal information are required to keep that personal information confidential and not to use or disclose it for any purpose other than performing our services or providing our products on our behalf.

From time to time we may use your personal information to send marketing or promotional material about our offers, events, competitions, promotions, membership and loyalty programs or to enable our related entities to directly market their products and services to you. We or our related entities may conduct these marketing activities via telephone, email, SMS, social media or other means. Marketing material will generally only be sent you on an 'opt-in' basis. Each time you are sent a marketing communication you will easily be able to 'opt-out' if you no longer wish to receive the material, or you may contact us and we will, as soon as is practicable, process your request to 'opt-out'.

We use systems located within Australia. However, we may send your information overseas to service or product providers or other third parties who operate or hold data outside Australia. Where we do this, we will take reasonable steps to ensure that appropriate data handling and security arrangements are in place.

We will provide methods for customers to interact anonymously whenever it is lawful and practicable to do so.

## **5. Information Collected from Our Website**

If you use our website or contact us by email, we may collect personal information you provide such as your name, date of birth, occupation, telephone, fax and mobile numbers and postal or email addresses. We may also collect information such as the areas of our websites you have accessed, the time and date of access and the type of browser software used.

We may use "cookies" to store and sometimes track information about you on an anonymous basis. A cookie is a small amount of data sent from a server which is stored on your computer's hard drive. You can set your browser to refuse cookies or to ask you before your browser accepts them. Parts of our websites will not function if "cookies" are not enabled.

## **6. How We Hold and Secure Personal Information**

We will take reasonable steps and implement systems to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. We will also take all reasonable steps to ensure that all personal information we collect, use or disclose is accurate, up to date and stored in a secure environment and accessed only by authorised persons.

Once your personal information is no longer needed by us or we are not legally bound to retain your personal information, we will ensure measures are taken to see that your personal information is de-identified or destroyed.

## **7. Complaints, Seeking Access and Changing Your Personal Information**

Except where the Act provides, you have the right to access personal information that we hold about you. Upon your written request to the Privacy Officer you will be provided access to your personal information within a reasonable period of time.

If you think personal information collected from you is inaccurate, incomplete, out-of-date or incomplete, you may write to the Privacy Officer and your records will be changed as soon as is practicable.

If you wish to make a complaint about a breach of the Australian Privacy Principles or Act, please contact The Privacy Officer. If your complaint is not resolved by the Privacy Officer, or you do not wish to contact the Privacy Officer, you can make an application to the Office of the Australian Information Commissioner at GPO Box 5218, Sydney, NSW 2001.

Our Privacy Officer can be contacted by email at [dmckinnon@frontierhospitality.com.au](mailto:dmckinnon@frontierhospitality.com.au) or by post at Privacy Officer, 31/191-195 Greens Rd Dandenong South 3175.

## **8. Amendments and Questions**

A copy of this Privacy Policy will be made available to anyone upon request or through our website [www.frontierhospitality.com.au](http://www.frontierhospitality.com.au) We may amend this Privacy Policy from time to time at our discretion.

If you have any questions or concerns about any aspects of our Privacy Policy please contact our Privacy Officer.

Further information about privacy issues can be found on the website of the Office of the Australian Information Commissioner's at [www.privacy.gov.au](http://www.privacy.gov.au)