

## **Privacy Policy**

Redcape Hotel Group is committed to complying with all privacy laws and principles, including the principles contained in the Privacy Act 1988 (Cth) as in force from time to time, and to protecting personal and sensitive information from unfair and unauthorised use. We are also committed to ensuring that our employees are aware of their obligations in relation to the protection of personal and sensitive information.

This Policy outlines how Redcape Hotel Group collects, uses, discloses and stores personal information.

### **What is personal and sensitive information?**

Personal information is any information or opinion about an identified or identifiable individual (even if this information does not identify a person by name – examples include address, place of work, business activities and employment details) whether or not that information or opinion is true or not and whether or not the information or opinion is recorded in a material form or not.

Personal information may include sensitive information such as a person's race or ethnic origin, political opinions, religious beliefs, membership of a trade association, sexual preferences, criminal records, health records and other sensitive or private matters.

### **Collection of personal information**

Redcape Hotel Group only collects information that is reasonably necessary to enable it to run its business, and will do so only by lawful means. Wherever possible, Redcape Hotel Group will collect personal information directly from the individual. Redcape Hotel Group will only collect information from third parties with the individual's consent or in permitted circumstances under applicable privacy laws as in force from time to time.

As an example, Redcape Hotel Group collects information as part of the recruitment process. Redcape Hotel Group requires this information for its business in order to comply with Liquor Licensing requirements. For this purpose, Redcape Hotel Group may request information from prospective employees such as criminal history records and other sensitive information.

### **Use and disclosure of information**

Any information collected will only be used or disclosed for the purposes it was collected, except in circumstances where Redcape Hotel Group has your consent or where Redcape Hotel Group is permitted to use or disclose the information by a relevant privacy law as in force from time to time, for law enforcement purposes, when otherwise authorised by law or when the person would reasonably expect the information to be used for a secondary purpose.

In addition, Redcape Hotel Group may use personal information for direct marketing, but only with the individual's consent and if the individual would reasonably expect Redcape Hotel Group to use or disclose the information for the purpose of direct marketing. Redcape Hotel Group may use a third party supplier in the collection or distribution of information. No collected information is sold to any party.

### **Probity investigations**

As part of the recruitment process Redcape Hotel Group reserves the right to conduct probity investigations into a person's background to determine their suitability for the role in compliance with privacy laws as in

force from time to time. This will only be done with a prospective employee's consent. We will only disclose your personal information where we are required or authorised by law to do so.

### **Accuracy of personal information**

Redcape Hotel Group will take reasonable steps to make sure that the personal information it collects, uses or discloses is accurate, complete, relevant and updated when advised about changes.

We seek your assistance by asking you to contact Redcape Hotel Group if your personal information changes or if you believe your personal information (such as your address, contact details or bank account details) is incomplete or inaccurate.

### **Storage & Security of information**

Redcape Hotel Group takes reasonable steps to protect and secure personal information from loss, misuse, interference or theft as well as unauthorised modification, access or disclosure.

Redcape Hotel Group will also take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose.

### **Access to personal information**

Individuals may access their records on request, subject to some exceptions. Subject to applicable law as in force from time to time, if you seek access to the personal information which Redcape Hotel Group holds about you, Redcape Hotel Group will make available to you the personal information to which you are entitled.

If Redcape Hotel Group does not give you access to your requested personal information, Redcape Hotel Group will provide a written notice of the reasons for the refusal and the mechanisms available to make a complaint.

Redcape Hotel Group is permitted to charge you for reasonable costs incurred in providing you with access to your information, but there will be no charge for lodging a request for access.

### **Websites**

All data collected through websites are anti spam compliant and state that any information obtained is not sold to third parties.

We may disclose to third party organisations such as our affiliates, business partners, advertising partners, mailing and printing houses, IT providers and other service providers who may assist us in providing services to you. In such cases we have taken steps to ensure that any third party access to personal information complies with the Australian Privacy Principles. Any information collected is not sold to any third party and providing of personal information via venue websites is not compulsory and is at the discretion of the individual.

Personal information collected via websites and other means, may be used by the venue for promotional information or advertising. The individual will have the ability to 'unsubscribe' at any time should they wish discontinue correspondence from the venue.



Any member of the public will also have access to details or information registered by contacting the Redcape Hotel Group's Privacy Officer.

### **Subject to Change**

This Policy will be subject to change at Redcape Hotel Group's absolute discretion. Employees will be required to comply with the Policy as amended from time to time.

### **Contact Us**

In the event that you have a question, concern or complaint regarding the way in which we handle personal information, you should contact our Privacy Officer direct at:

Privacy Officer  
PO Box 115,  
Drummoyne NSW 1470

or

[privacy@redcape.com.au](mailto:privacy@redcape.com.au)