# Our Commitment to Protecting your Privacy



Effective 21 December 2015

At Be. Fremantle we appreciate that your privacy is important and we are committed to protecting the Personal Information that we collect from you.

Be. Fremantle Pty Ltd (A.C.N. 600 791 491) and its related bodies corporate ("Be. Fremantle", "us" or "we") manage Personal Information in accordance with the Privacy Act 1988 (Cth) ("Privacy Act"). This Privacy Policy outlines the types of Personal Information that we may collect, how that Personal Information will be used, disclosed, transferred and stored and sets out the measures that we take to comply with the Privacy Act.

Your privacy is very important to us. For that reason, please read the following policy carefully and get in contact with us if you have any questions.

# **COLLECTION**

Be. Fremantle will only collect and hold Personal Information about you that is reasonably necessary to undertake our business activities and functions, or as otherwise permitted by law.

### Why we collect Personal Information

We may collect your Personal Information for one or more of the following reasons:

- providing our products or services to you,
- to assist with your queries,
- processing a booking or application that you have made,
- acting as your agent if you request us to do so,
- for surveys, direct marketing, promotions or competitions,
- facilitating our internal business operations, including the fulfilment of any legal requirements, and
- analysing our services and customer needs with a view to developing new and/or improved services.

# How we collect your Personal Information

We generally collect Personal Information directly from you, through the use of any of our standard forms, over the internet, via email or through a telephone conversation with you. We may also collect Personal Information from third party contractors or agents who provide our products and services on our behalf.

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### What kinds of Personal Information we collect

The types of Personal Information that we collect may include your name, address, other contact details and other such information that is relevant for us to provide our products and services to you in the manner that you have requested, or to comply with the law.

We do not generally collect sensitive personal information from you. However, if you provide such information to us, we will only collect that information with your express consent and only where such information is reasonably required in order for us to provide our products or services to you (such as special access or assistance requirement due to a health condition). We shall not disclose sensitive personal information to any other party without your consent.

#### Internet users

If you access our websites or any mobile applications ("apps"), we may collect additional Personal Information about you including:

- server address / IP address,
- date and time of visit,
- pages visited,
- documents downloaded,
- the site you visited prior to visiting our website,
- the browser that you are using to access our website,
- if you have visited our website before,
- tracking user preferences, and/or
- location data.

In addition, our websites and apps use cookies. The main purpose of cookies is to monitor usage of our websites and apps to prepare customized web pages so that we may serve you more effectively. You may wish to configure your browser so that it does not accept cookies, however you may be unable to enjoy the full functionality of our websites or apps if these are disabled.

# **Failure to provide Personal Information**

If the Personal Information you provide to us is incomplete and/or inaccurate, or you choose not to provide us with the Personal Information that we have requested, it may affect our ability to provide you with our products and services.

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### **DEALING WITH PERSONAL INFORMATION**

### **Use and Disclosure**

In order to provide products and services to you we may disclose your Personal Information to:

- service providers, contractors, agents or other business partners who assist us in providing our products and services to you;
- external providers of services where you have engaged us to act as your agent;
- other service providers, who provide the various services that you have requested and we have arranged;
- our related bodies corporate;
- our professional advisers;
- an entity to whom we are required to disclose such information under law;
- other parties with your consent or direction.

We will only provide such Personal Information to those third parties as required to provide our products or services, unless otherwise authorised by you or required under law.

### Marketing

When you provide us with information about yourself, you will usually be given the option to let us know that you do not want that information to be used for direct marketing purposes. You can change your mind about your preferences in respect of direct marketing and make choices at any time by following the unsubscribe instructions included in the relevant communication, or by contacting our Privacy Officer. Our social media pages provide instructions as to how you can unsubscribe from the relevant social media website or page.

# INTEGRITY OF PERSONAL INFORMATION

### Security

The security of your Personal Information is important to us. We may store your Personal Information in different ways, including in paper form, electronic form, telephone recordings and utilising secure document retention services (including those located offsite). We take all reasonable measures to ensure that your Personal Information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic (firewalls and access controls) and physical security measures.

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#### **Links to Other Websites**

Our websites or apps may contain links to other websites. We are not responsible for the security or privacy of any information collected by third-party websites or other services. You should exercise caution, and review the privacy statements applicable to the third-party websites and services you use.

### **ACCESS AND CORRECTION**

#### Access

You may request access to the Personal Information that we hold about you at any time by contacting our Privacy Officer using the details set out in this Privacy Policy. We will respond to any such request for access to Personal Information within a reasonable time frame and will provide you access to the Personal Information that we hold that belongs to you, unless we are authorised not to do so by law. We may charge you a reasonable fee for processing your request and should we decline you access to your Personal Information, we will provide you with a written explanation setting out the reasons for doing so.

### Correction

If, upon receiving access to your Personal Information, or at any other time, you believe the Personal Information that we hold about you is inaccurate, incomplete or out of date, please notify our Privacy Officer using the details set out in this Privacy Policy. Where you notify us that your Personal Information is inaccurate, incomplete or out of date, we will take reasonable steps to correct the information unless we are authorised not to do so by law. Should we decline your request to correct your Personal Information we will provide you with a written explanation setting out the reasons for doing so.

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### **CONTACTING BE. FREMANTLE**

### **Contact Details**

The Be. Fremantle Privacy Officer

Post: Be. Fremantle

PO Box 49

Fremantle WA 6959

Email: <u>stay@befremantle.com.au</u>

Phone: +61 (0)8 9430 3888

#### **Feedback**

If you have any comments, queries or concerns about our Privacy Policy or the way in which we handle your Personal Information, please contact our Privacy Officer using the details set out in this Privacy Policy.

## Complaints

Should you believe that we have not fulfilled our obligations under the Privacy Act, have not complied with the terms of our Privacy Policy, or would like to appeal a decision made by us relating to your Personal Information, you can make a complaint in writing to our Privacy Officer using the details set out in this Privacy Policy. We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.

If you are unhappy with a response that you have received from Be. Fremantle, you may direct your complaint to the Office of the Australian Information Commissioner (OAIC). You may contact the OAIC by visiting their website: www.oaic.gov.au

#### AMENDMENTS TO THIS PRIVACY POLICY

We may amend this Privacy Policy at any time. Amendments to this Privacy Policy will be posted on our websites and will be effective when posted. We encourage you to check our web site regularly for any updates to this Privacy Policy.