

Steele Hotels & Apartments Pty Ltd Privacy Policy

Introduction

Steele Hotels & Apartments Pty Ltd (ABN: 56 065 787 704) respects the privacy of your personal information and is committed to ensuring its proper collection, storage, use and disclosure. Under no circumstances will information be sold or made available to marketing agencies or similar parties who are not involved with Steele Hotels & Apartments Pty Ltd. The following statement addresses relevant privacy issues for Steele Hotels & Apartments Pty Ltd. However, if you have any further questions relating to this privacy statement, please do not hesitate to contact us by email on stay@itara-jacana.com.au or phone (07) 4723 4644.

Collection of Information

Steele Hotels & Apartments owns and operates properties offering accommodation, and meeting facilities throughout Australia. Steele Hotels & Apartments collects personal information in order to carry out its business as operators of these facilities. Most of this information is stored in our property reservation systems.

The purpose for collecting the information will normally be obvious at the time, such as for arranging accommodation, providing confirmation of a reservation, providing better customer service or sending information about promotions and special offers. Personal information may also be disclosed;

- a) Where we have the consent of the individual to do so;
- b) As required by law;
- c) Under any other circumstances as permitted by the Privacy Act 1988.

Where practical it is the policy of Steele Hotels & Apartments to collect the information from the individual concerned. We will ensure that we do so in a fair manner and we will let the individual know;

- a) where and how to contact our organization;
- b) the purposes for which their personal information is collected;
- c) the process by which the individual can gain access to the information and
- d) to those third parties to whom information is usually disclosed.

Wherever we collect personal information from third parties concerning an individual, we will take reasonable steps to advise that individual as soon as is practicable.

To whom do we disclose personal information?

The Privacy Act 1988 and other legislation govern collection, maintenance and disclosure of certain personal information.

We primarily disclose information to properties within the Steele Hotels & Apartments Pty Ltd group. Some of those properties may have their own privacy policies that differ from Steele Hotels & Apartments.

Other parties to whom Steele Hotels & Apartments may disclose personal information include:

- (a) Related parties and corporate affiliates;
- (b) External auditors, accountants, bankers and lawyers appointed to or by Steele Hotels & Apartments;
- (c) Valuers where Steele Hotels & Apartments is seeking to revalue a property or lease;
- (d) Regulatory authorities and law enforcement agencies to assist in any lawful investigation and if required or authorized by law;
- (e) A purchaser or potential purchaser of the assets of Steele Hotels & Apartments in the event of a sale of all or part of Steele Hotels & Apartments' business operations;
- (f) Any other parties as authorized by law.

From time to time Steele Hotels & Apartments engages service providers in its business to perform specific services on our behalf. These service providers may include consultants, legal representatives, travel agents, database managers and marketing organizations. In order for them to provide services to Steele Hotels & Apartments it is sometimes necessary for them to have access to the personal information held by Steele Hotels & Apartments. However, these service providers are only permitted to use this information for purposes authorized by Steele Hotels & Apartments and must comply with the requirements of the Privacy Act and with our Privacy Policy.

How is Information collected?

Personal information is collected through several different channels, including an application or reservation form, the internet, applying to become a member of the Rewards loyalty program run by Steele Hotels & Apartments or other loyalty program managed by Steele Hotels & Apartments, through a competition or when registering and staying at a Steele Hotels & Apartments property. Occasionally personal information is collected through a questionnaire or survey.

Sometimes personal information may be collected through travel agents and other third parties. Steele Hotels & Apartments may collect information in particular circumstances about personal preferences to assist in its marketing initiatives.

From time to time, Steele Hotels & Apartments may conduct surveys as to customer's personal preferences. These surveys may collect personal information to improve our customer services.

Sensitive Information

Without your written consent, we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious beliefs or affiliations, disability, sexual orientation or criminal record.

This is subject to some exceptions where collection is required by law.

Use of Cookies on our website

Like many other commercial websites, Steele Hotels & Apartments may employ a standard technology called a "cookie" to collect information about how the Site is used including data such as pages visited and inferred preferences, as well as aggregate Site data. "Cookies" are pieces of electronic information (specifically, a string of text) that your browser and your operating system store on your hard drive for record-keeping purposes.

Cookies can store a user's ID and password, personalize home pages and identify which parts of a site have been visited or keep track of previous selections or purchases. In this way, cookies can enhance the user's visit.

Other companies, which place advertising or links on the Site, may collect information about you when you view or click on their advertising or content through the use of cookies. Due to the technical operation of the Internet, Steele Hotels & Apartments cannot control this collection of information and accepts no responsibility for this collection, use or disclosure. You should contact these advertisers or content providers if you have any questions about their use of the information they collect.

If guests do not want the benefits of these cookies they can set their browser to reject the cookies. Guests should consult the instructions for their particular browser on how to do this. However, guests should understand that rejecting cookies might affect their ability to perform certain functions on our website and our ability to recognize their browser from one visit to the next.

Similarly, there may be links that will let you leave the Site. The use of information and/or privacy provided by the operator of a linked site as to any information you provide in accessing a linked

site is in no way subject to this Privacy Policy. Steele Hotels & Apartments takes no responsibility for any privacy policies or practices of any web sites accessible from the Site, whether or not such practices conform to privacy policies of those sites.

Communication by Email

If you send an e-mail message and/or attachment to any recipient at Steele Hotels & Apartments Pty Ltd, the information that you send will be collected and retained by us through our automatic storage and back up system, which records each e-mail received. This information may be shared with our related entities and properties within the Steele Hotels & Apartments network. This information will only be used for the purpose for which it was sent, and where necessary, to investigate and/or discipline employees, contractors and/or service providers.

Credit Cards

This section is designed to deal with situations where a person provides details of their credit card to Steele Hotels & Apartments. The policy is also designed to ensure that Steele Hotels & Apartments will store and destroy credit card details in a manner which protects the credit card details from misuse, loss, unauthorized access, unauthorized modification, and unauthorized disclosure.

Collection of Credit Card Details

Steele Hotels & Apartments is committed to ensuring that credit card details are collected in a secure manner. Steele Hotels & Apartments will take reasonable steps to protect the credit card details it holds from misuse and loss and from unauthorized access, modifications and disclosure during collection by adopting the following practices: destroying emails containing credit card details; ensuring that where credit card details are collected on-line, encryption is included within the on-line web page, databases and other supporting programs; only collecting credit card details in an appropriate environment, for example not requesting credit card details verbally in a public area; and ensuring that when credit card details are collected via facsimile, the facsimile is placed in a secure location.

Storage of Credit Card Details

Steele Hotels & Apartments is committed to ensuring that credit card details are held securely. Steele Hotels & Apartments will take reasonable steps to protect the credit card details it holds from misuse and loss and from unauthorized access, modifications and disclosure by adopting the following practices: ensuring that credit card details are stored in a secure and protected manner such as locked filing cabinets; removing emails containing credit card details from all email systems; where possible, removing any credit card details from Steele Hotels & Apartments networked computers; ensuring that EFTPOS machines and other devices used to collect credit card details are stored securely, particularly when they are not in use (e.g. overnight); ensuring that appropriate staff only have access to credit card details; and ensuring information is transferred securely.

Credit card details may be stored in hard copy documents

If credit card details are stored as electronic data appropriate security measures will be utilized in accordance with the Steele Hotels & Apartments Security Policy. Some of the ways Steele Hotels & Apartments seeks to protect credit card details include the following: confidentiality requirements on the use of information by Steele Hotels & Apartments employees; policies on document storage and security; security measures for access to Steele Hotels & Apartments computer systems; controlling access to Steele Hotels & Apartments premises; web site protection measures. Credit Card details are required to be stored onsite or in an easily accessible location for 12 months for

charge back purposes. After 12 months, credit card details may be moved offsite providing the credit card details are stored in a secure location. Credit card details must be stored for the length of time prescribed by the Records Disposal Authority.

Destruction of Credit Card Details

Credit card details will be destroyed in a secure manner when they are no longer needed by Steele Hotels & Apartments. Examples of destruction in a secure manner include shredding, pulping or disintegration of paper files.

Maintenance of the Quality of Information

Steele Hotels & Apartments will take reasonable steps to ensure that the personal information it collects and uses is accurate, complete and up to date.

If at any time you wish to review information that Steele Hotels & Apartments holds concerning you, please contact us.

It is the policy of Steele Hotels & Apartments, from time to time, to delete or de-identify information about you when it is no longer needed or no longer a legal requirement for the information to be kept.

Security of Information

Steele Hotels & Apartments endeavors to ensure the security of all of the personal information that is on its information systems and in its possession. We restrict access to this information to those employees who need it in the course of their employment. We also use passwords and security access IDs to restrict access of confidential and personal information.

A general privacy statement covering our data handling practices will be available on our internet sites

Access to and Correction of Personal Information

You can contact us if you would like details of personal information that Steele Hotels & Apartments may hold about you or if you would like to correct or update that information. To ensure that we do not disclose personal information to the wrong person, we may request evidence of identity or a written request.

In most cases, individuals will be able to access their personal information upon request. However, Steele Hotels & Apartments may occasionally need to deny access to information. Factors affecting an individual's right to access include;

- a) Access would have an unreasonable impact on the privacy of others;
- b) A frivolous or vexatious request;
- c) Access would be unlawful;
- d) Denying access is required or authorized by or under law.

We will give you reasons if we deny access.

Opting Out / Complaints

Steele Hotels & Apartments may, from time to time, send to its customer's information about promotions or special deals. We will normally give you the choice not to receive this material at the time when we initially collect your personal information. If at any time you are receiving this information and do not wish to receive it any longer, please contact us and we will remove your name from our mailing list.

If you wish to make a complaint or view what personal information we may hold we may only disclose information if our internal procedures are satisfied.

Changes to the Privacy Statement of Steele Hotels & Apartments Pty Ltd

This policy is dated 1st July 2011. Steele Hotels & Apartments reserves the right to modify or amend this statement at any time and will provide an update of the policy on our Web Site if it has been changed. If you have any further questions about our privacy practices, please contact us.