

SPIRIT HOTELS PRIVACY POLICY

Overview

At Spirit Hotels, we respect the privacy of your personal information that is in our care. Personal information means information which identifies you as an individual or from which your identity can be reasonably ascertained.

This Privacy Policy relates to personal information we collect and handle about you as our customers, visitors to our website, apps, social media and other digital services and members of the public. Our team members and job applicants can contact our human resources team for details about the privacy of their personal information.

Spirit Hotels do not sell personal data. In order to provide goods and services to you, we share personal data with trusted operational suppliers. **Again, these companies do not sell your personal data and they are contractually prevented from doing so.** Furthermore, all companies with whom we share data can use the data only for these contractually agreed purposes and must handle the data in a confidential and secure manner in accordance with Australian privacy legislation. Currently, we have a specialist service provider located in the United States of America.

We are part of the Wesfarmers group. Wesfarmers has its own privacy policy which is available at www.wesfarmers.com.au.

Types of personal information collected

The types of personal information we collect includes name, contact details, identification information, household details, payment and transaction details/history and our other clubs and programs operated from time to time, records of your communications and interactions with us, and details/history of preferences, interests and behaviour relating to transactions, products, services and activity with our digital services.

We may not be able to provide our products or services, or make offers to you without your personal information. For example, we may not be able to ensure you are awarded member points or contact you about prize winnings.

Where you provide us with personal information about someone else you must have their consent to provide their personal information to us based on this Privacy Policy.

How personal information is collected and held

We may collect your personal information in relation to your interactions and transactions with us and Wesfarmers group companies. This includes: using your members card, number or associated identifiers such as payment cards; making a purchase in the venue; making a non-cash payment; participating in a promotion, competition, or survey; registering for services; using related digital services. We may monitor and record your communications with us (including email and telephone) for security, dispute resolution, and training purposes and we also operate video and audio surveillance devices in our premises. We may also collect personal information from third parties including public sources, information service providers, providers who administer Coles-branded products and services such as payment cards and insurance, anyone authorised to act on your behalf, and other Wesfarmers group companies (e.g. Flybuys).

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We implement a range of measures to protect the security of that personal information. We also take measures in respect of destroying or de-identifying personal information that is no longer needed for any lawful purpose.

Purposes for handling personal information

We handle your personal information in connection with providing, administering, improving and personalising our products and services. This can include processing payments, managing promotions, providing refunds and discounts, verifying your identity, communicating with you (including direct marketing), conducting product and market research, maintaining and updating our records, dealing with enquiries from you, and working with our service providers and other Wesfarmers group companies. Using personal information, we endeavour to improve our understanding of your interests, suitability and behaviour in relation to products, services and offers, including conducting risk assessments for financial products (including credit and insurance).

We may also handle your personal information to protect our lawful interests and facilitate purchases and potential purchases of our businesses. We may provide marketing communications and targeted advertising to you on an ongoing basis by telephone, electronic messages (eg. email), our digital services and other means. These communications may relate to the products and services we, and other Wesfarmers group companies provide, and other products which may be of interest to you. You can call us on 1300 300 640 at any time to opt out of electronic and telephone direct marketing communications.

Sharing of personal information

To make it easy for you to deal with other Wesfarmers group companies and provide you with a more personal and consistent experience, we may exchange and combine personal information with them for the purposes described in our respective privacy policies.

We and Wesfarmers group companies may exchange your personal information with service providers engaged to assist with services including data processing, data analysis, information broking, credit reporting, online computing, printing, contact management, legal, accounting, business consulting, marketing, research, auditing, archival, delivery, security, investigation and mailing services, and in the provision of Coles-branded products and services such as payment cards and insurance.

The third parties to whom we disclose personal information may be located in Australia and other countries including the United States of America. We take steps to ensure that our service providers are obliged to protect the privacy and security of your personal information and use it only for the purpose for which it is disclosed.

Digital services

We provide information and services through a range of digital and online services including websites apps, email, online advertisements, IPTV and social media profiles. These services may be operated by us and other Wesfarmers group companies (collectively, Spirit Hotels/Coles Digital Services) to provide a consistent experience, personalise your use of each of those services and provide targeted marketing.

Spirit Hotels/Coles Digital Services may use “cookies”. A cookie is a piece of information that allows the server to identify and interact more effectively with your device. The cookie assists us in maintaining the continuity of your browsing session (e.g. to maintain a shopping cart) and remembering your details and preferences when you return. Other technologies that may be used with Spirit Hotels/Coles Digital Services include web beacons (which may operate in conjunction with cookies), Flash local stored objects and JavaScript. Some of these cookies and other technologies are consistent across various Spirit Hotels/Coles Digital Services, allowing us and the other providers of these services to understand you better and provide a more consistent experience across these services. You can configure your web browser to reject and delete cookies and block JavaScript but you may find some parts of Spirit Hotels/Coles Digital Services then have limited functionality. You can control your preferences regarding Flash local stored objects at http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

Our systems record a variety of information in relation to interactions with our online services. This can include information about software versions used, device identifiers (like IP address), location data (where available and not disabled by the user), dates, times, file metadata, referring website, data entered and user activity such as links clicked.

In some cases third parties may use cookies and other technologies such as those described above as part of Spirit Hotels/Coles Digital Services. These technologies may be used in connection with activities like surveys, online behavioural advertising, website analytics and email campaign management. The services we may use from time to time include Google Analytics, Google Display Network, Google AdSense, DoubleClick, Yahoo, Adobe, Campaign Manager and Microsoft. You can find more details in the privacy policies for those services (e.g. Google’s Ads Preferences Manager), including information on how to opt-out of certain conduct. Bear in mind, you may need to opt-out separately from each service. The website youonlinechoices.com.au also allows you to opt-out of some online behavioural advertising and provides further information about how online behavioural advertising works. You can contact us to request further details of the services we use. Many of these services operate without collecting or using any personal information.

Some information we collect in relation to Spirit Hotels/Coles Digital Services is not related an individual. In many cases the information only relates to a device or is of an aggregated or statistical nature, and we will have no



way of knowing the identity of the user. In other cases we may associate information about your use of Spirit Hotels/Coles Digital Services over time with your personal information, e.g. where on any occasion you have logged in, followed a link sent to you by email or we have otherwise been able to identify you.

We are constantly developing and enhancing our use of online technologies, and make reasonable efforts to ensure we keep this Privacy Policy and related documents up to date in this regard. Please check back when you return to use our online services to ensure you are familiar with our current practices.

Our online services may contain links to other sites. We are not responsible for the privacy practices or policies of those sites and recommend that you review their privacy policies.

Procedures for access, correction and feedback

If you wish to access or correct any personal information we hold about you or have any feedback or concerns about privacy, please contact us as set out below. Where you seek a response from us, we will let you know who will be handling your matter and when you can expect a full response.

In the case of access and correction requests, please provide as much detail as you can about the particular information you seek, in order to help us retrieve it. Under the Privacy Act and other relevant laws, we are required to provide our reasons if we refuse your request. Where we decide not to make a requested correction and you disagree, you may ask us to make a note of your requested correction with the information.

Additional privacy information

In addition to this Privacy Policy, many Coles and Wesfarmers companies and brands have their own privacy statements and other terms which provide further information about your privacy. Please see the relevant material relating to those products and services for details, including where those Coles-branded products and services are provided by or with third parties who may collect your personal information.

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

Contact

Queries regarding privacy should be directed to the Coles Privacy Officer:

Phone: 1300 300 640

Email: privacy@coles.com.au

Post: 800 Toorak Road
Hawthorn East
VIC 3123

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Liquorland (QLD) Pty Ltd (and its subsidiaries) trading as Spirit Hotels

ABN 57 079 861 626