

# Privacy Policy

CHP and its associated companies are committed to protecting your personal information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth).

---

## 1. Purpose of our Privacy Policy

This Policy sets out how CHP Management Pty Ltd ABN 82 168 793 253 and its related entities (**we, us or our**) collect, uses, manages and stores personal information in connection with the Marriott Waters Loyalty App (**Loyalty App**) or other aspects of its business.

We may not be legally required to comply with the Australian Privacy Principles but we seek to do so as a matter of good practice.

In this Policy:

- (a) **personal information** means any information or opinion about a natural person (whether or not true) who is identified or reasonably identifiable;
- (b) **sensitive information** means information about an individual's race, ethnicity, political opinions, religious beliefs or affiliations, philosophical beliefs, membership of a political association, professional or trade association or trade union, sexual orientation or practices, criminal record or health, genetic or biometric information;
- (c) **"you" and "your"** means a user of the Loyalty App whose personal information we have collected.

## 2. What personal information we collect

The personal information we collect or hold will depend on the context in which we collect it, and may include your:

- (a) name and contact information;
- (b) email address;
- (c) home and/or postal address;
- (d) telephone (including mobile) and fax numbers;
- (e) employment history and academic qualifications;
- (f) position within an organisation; and
- (g) location (including by using your mobile phone or other device to identify your location),

and any other information you submit to us, including all information you enter in the Loyalty App or that the Loyalty App generates in relation to you, as well as any other information that we consider is necessary to perform our services.

Where personal information is provided by a third party (e.g. information relating to a store's customers), we rely on the third party to ensure that the individuals whose information is being provided have been informed about our role in collecting that personal information and, where necessary, informed about this Policy.

### 3. How we collect personal information

We collect personal information in a number of ways, including:

- (a) where you provide information directly to us for example through the Loyalty App, through our website, by email or by phone;
- (b) where you submit your details to open an account with us;
- (c) from third parties, such as our service providers;
- (d) through marketing and business events;
- (e) where you provide feedback to us;
- (f) when you apply for a job with us;
- (g) when you do business with us (e.g. as a supplier or staff member of a supplier);
- (h) from related entities in our corporate group; and
- (i) from publicly available sources of information.

We do not generally collect sensitive information about individuals. If we do collect, use or disclose sensitive information about you, we only do so where it is reasonably necessary to conduct our business and where we have obtained your consent or where it is otherwise permitted by law.

If you do not wish for your personal information to be collected in a way anticipated by our Privacy Policy, we will use reasonable endeavours to accommodate your request. If we do comply with your request, or you provide us with inaccurate or incorrect information, we may not have sufficient information to conduct our business and we may be limited in our ability to:

- (i) provide you services using the Loyalty App;
- (ii) keep you informed of our updates and services information;
- (iii) properly conduct our operations;
- (iv) consider you for employment;
- (v) do business with you;
- (vi) communicate messages or notifications to you or from you; and
- (vii) respond to your enquiry or request.

### 4. Purpose of collection, use and disclosure of personal information

We collect, use and disclose personal information for the purpose of conducting our business, which includes:

- (a) allowing us to identify you;
- (b) providing you with the services that you have requested including access to the Loyalty App;
- (c) managing and administering those services;
- (d) monitoring network use, quality and performance;
- (e) operating, maintaining, developing, testing and upgrading the Loyalty App;
- (f) allowing users to communicate with other users to the extent enabled by the Loyalty App;
- (g) informing you of new services and products;
- (h) contacting you in any way (including mail, email, phone, text, online advertising, multimedia messages or notifications) about products and services offered by us;
- (i) fraud checking and quality control;
- (j) researching and developing our services;
- (k) responding to enquiries or requests;
- (l) considering applicants for employment (including checking qualifications, experience and references);
- (m) sending direct marketing to you (see 7 below);
- (n) any other purposes to which you consent, whether expressly or impliedly; and

- (o) any other purposes authorised or required by law.

In conducting our operations, we may share some of your personal information with third parties such as outsourced service providers and contractors. We take reasonable steps to impose suitable confidentiality and security requirements on such providers and contractors. In particular, we may disclose your personal information to:

- (i) our business partners;
- (ii) related entities in our corporate group;
- (iii) third party technology providers;
- (iv) any other third parties incidental to us carrying out our business;
- (v) other service providers or referral partners in order to provide our services to you, or to assist our functions or activities (such as professional advisers);
- (vi) any referees nominated by an employment applicant;
- (vii) any other party where you provide your consent, whether express or implied; and
- (viii) as authorised or required by law.

## 5. Overseas disclosure

We may disclose your personal information to overseas recipients if it is necessary to provide our services. We also use technology providers that store personal information primarily in the USA, UK and Canada.

When we disclose personal information to an overseas recipient, we take reasonable steps to impose suitable confidentiality and security requirements on the recipient.

## 6. Storage and security of personal information

If we hold your personal information, we will take reasonable steps to ensure that the personal information is secure and may only be accessed by authorised persons. If we store your personal information electronically on our database, we take reasonable steps to use secure servers and to ensure there are restrictions as to who has access to that information through password protection.

We cannot control the actions of other users with whom you share your information. Further, we cannot guarantee that only authorised persons will access your personal information. Please notify us immediately if you believe there has been any unauthorised access to your information. Except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. However, nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Act 2010 (Cth).

We will retain personal information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by law.

If any personal information that we hold is no longer required for the purpose for which it was collected and no applicable law requires us to retain that information, we will take reasonable steps to de-identify or destroy the information.

## 7. Direct marketing

We may use your personal information for direct marketing purposes (for an indefinite period, subject to your ability to 'opt out' at any time). This includes sending you promotional or marketing material that may interest you. When we contact you, it may be by mail, telephone, email, SMS, targeted digital advertising, push notification or other means. If we use or disclose your personal information for the purpose of direct marketing, we will:

- (a) allow you to 'opt out' or in other words, allow you to request not to receive further direct marketing communications; and
- (b) comply with a request by you to 'opt out' of receiving further direct marketing communications within a reasonable timeframe.

You may ask to be removed from our marketing lists at any time by directly contacting us. If you don't wish to receive direct marketing materials please contact our Privacy Officer using the details set out at the end of this Privacy Policy.

## 8. Access to and correction of your personal information

We will take reasonable steps to ensure the personal information we hold is complete, up to date and accurate.

You may request access to the personal information we hold about you by contacting our Privacy Officer using the details set out at the end of this Privacy Policy. Unless permitted or required by law not to provide you with access, we will provide you with access to your personal information and we reserve the right to charge you a reasonable fee for giving access.

If personal information we hold about you is incorrect we will, upon your request, correct it unless permitted or required by law not to do so.

If you request us to correct personal information that we hold about you and we refuse to do so, we will, to the extent reasonable, provide you a written response as to our reasons.

## 9. Complaints and disputes

If you wish to complain about our handling of your personal information, please address your complaint in writing to our Privacy Officer using the details set out at the end of this Privacy Policy.

The Privacy Officer will co-ordinate the investigation of any complaint and any potential resolution of a complaint. We will aim to resolve all complaints as soon as practical.

## 10. Changes to this Policy

We may change this Privacy Policy at any time. If we make changes to this Privacy Policy we will notify you by publication on the Loyalty App. The revised version of the Privacy Policy will be effective at the time we post it.

The current version was first published in October 2017.

## How to contact us:

You can contact our Privacy Officer as follows:

**Mail:** 270 Auburn Road, Hawthorn Victoria 3122

**Telephone:** 03 9036 2855

**Email:** [privacy@chpmanagement.com.au](mailto:privacy@chpmanagement.com.au)