**VENUE PRIVACY POLICY - AUSTRALIA**

We appreciate the importance of customer privacy as an important part of our relationship with our customers, merchants and partners. We recognise the trust placed in us when you supply your personal information to us.

We control the collection, security, quality, use and disclosure of personal information in accordance with the *Privacy Act 1988 (Cth)*, *Privacy Act 1993 (NZ)* and the Privacy Principles (together, the **Privacy Law**). This Privacy Policy explains in general terms how we protect the privacy of your personal information under the Privacy Law.

**PERSONAL DATA**

Personal data is data subject to protection under privacy legislation. The expression ‘personal information’ is defined in the Privacy Law as information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

**REGISTRATION**

In order to use EzyCheckin, you must first complete the registration form and create a username and password (**Check-in Data**). During registration you must provide us with certain personal information such as your first name, your second name, your telephone number and email address.

We use Check-in Data only to provide to public heath officials required to assist in contact tracing, as required by law.

We may also collect information about how you use our website or the Services, your IP address and/or other device identifying data, and other information that you have provided for a service or information that you have requested from us (**Account and Marketing Data**).

We use this Account and Marketing Data to contact you about the services on our site in which you have expressed an interest, how you use the website or our Services, your IP address and/or device identifying data, and other information required to provide a service or information that you have requested from us.

We may then collect further personal data from you at several different points on our website.

**COLLECTION OF INFORMATION**

The kinds of personal data that we collect and hold about you depends on the transactions that you undertake with us.

For Check-in Data, we will only collect and store this information for a rolling period of 56 days, as required by law, after which it will be destroyed.

The kinds of information that we collect and hold may include:

* name
* contact details, contact number and email address

The information that we collect is collected in one or more of these ways:

* through disclosure of such information by you through our EzyCheckin app or website;
* through any registration process;
* through any contact with us (eg telephone call, email or the user dashboard); and
* third parties where you have authorised this or where the information is publicly available.

**USE OF INFORMATION**

Typical situations in which we collect and use personal data from you, is if you:

* register through our App or website
* subscribe to our publications
* express interest in our products and services
* use our website or mobile app

**HOW WE COLLECT PERSONAL DATA**

As far as possible, we will collect your personal data directly from you unless it is unreasonable or impracticable to do so. However, in circumstances where a product or service is to be provided to you as arranged by a third party, that third party may have provided us with your personal data.

If we collect personal data about you from someone else, we will, whenever reasonably possible, make you aware that we have done this, and the circumstances of that collection.

In particular, we will collect personal data about you in the following circumstances:

**Collection from Third Parties**

We will collect personal data from registered users who have provided your personal data to us for the purpose of using our products or the Services, for example, where a third party registers your attendance at a group event.

We will collect personal data for handling complaints.

**Collection from use of Website or Mobile App**

If you use our website or mobile app, we may utilise cookies and any other technologies, which enable us to monitor traffic patterns and to service you more efficiently if you revisit our website or mobile app. A cookie or similar technology does not identify you personally but may identify your internet service provider, computer or mobile device. You can set your browser or mobile device to notify you when you receive a cookie or web beacon, and this will provide you with an opportunity to either accept or reject it in each instance.

Generally, the purpose of collection and holding personal data, and the minimum information you need to provide, will be conveyed to you at the time of collection.

If we collect sensitive information about you, we will only do so with your consent, unless consent is not required by law. Sensitive information is defined in the Privacy Law and includes information such as health information.

The use of our products and services will require that you identify yourself when you deal with us. If you choose not to provide the personal data requested, then we may not be able to provide you with the products and the Services that you require.

**Unsolicited Personal Data**

If we receive unsolicited personal data about you, we will, within a reasonable period after receiving the information, determine whether or not we could have collected the information under the Privacy Law if we had solicited the information. If we could have collected the personal data, we will ensure that this Privacy Policy is complied with in relation to that information and will notify you (where possible):

* that the unsolicited personal data has been collected;
* the circumstances of that collection; and
* refer you to this Privacy Policy.

If we could not have collected the personal data had we solicited it, we will destroy the information or ensure that it is de-identified as soon as practicable.

**PURPOSE OF COLLECTION, STORAGE, USE AND DISCLOSURE OF PERSONAL DATA**

The purposes of collecting, storing, using and disclosing your personal data may be to:

* verify your identity
* provide the products and services you have requested
* administer and manage service offerings
* research and development of our products and services
* maintain registration records
* gain an understanding of your information and communication needs to provide you with a better service
* provide access and information about current and future services and benefits
* conduct research surveys and consultation to identify and analyse the ongoing needs of our service industry
* handle complaints about our products and services
* tell you about products and services that may be of interest to you.

**DIRECT MARKETING**

We may use or disclose your Account and Marketing Data for the purpose of direct marketing, to promote our products and services or those of third parties.

You expressly consent to the use and/or disclosure of your Account and Marketing Data for direct marketing purposes. You also expressly consent for us to disclose your Account and Marketing Data to our business partners or other third party providers to facilitate their sending direct marketing communications to you.

You may ask us to identify the source of the Account and Marketing Data that we use or disclose for direct marketing purposes. You can do this at any time by contacting us via the details set out at the end of this Privacy Policy.

If at any time you do not wish to receive any further direct marketing communications whether from us or from third parties, you can ask us not to send you any further direct marketing communications and not to disclose your Account and Marketing Data to third parties for that purpose. You can do this at any time by using the “unsubscribe” facility included in a prominent statement in the direct marketing communications or by contacting us via the details set out at the end of this Privacy Policy.

**DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

In addition to the direct marketing purposes referred to above, we may disclose your Account and Marketing Data to third parties, which may include:

* external service providers to whom we have contracted out functions
* our business partners that provide products and services to our registrants
* government and regulatory authorities and other organisations, as required or authorised by law
* our professional advisors
* our related companies

We may disclose your EzyCheckin Data **only** to a verified public health officer, as required by a public health official in accordance with the law for covid-19 contact tracing or contact tracing compliance purposes.

In these situations, we will prohibit the third party contractors from using personal data about you except for the specific purpose for which we supply it. We will not disclose your personal data to business partners as described above, if you advise us that you do not wish us to please refer to our contact details set out below.

Other than the above, we will not disclose your personal data without your consent, unless disclosure is either necessary to lessen or prevent a serious threat to life, health or safety, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity or serious misconduct.

**HOW WE HOLD YOUR PERSONAL DATA**

Once we have collected personal data from you, we transfer data to our services for storage and processing. You consent to that transfer.

**Data Quality**

We take all reasonable precautions to ensure that personal data about you collected by us is accurate, complete and up to date.

However, the accuracy of that information depends to a large extent on the information that you provide.

We require that you:

* let us know if there are any errors in your personal data, in particular your Check-in Data; and
* keep us up to date with changes to your information.

**Data Security**

We will take reasonable steps to ensure that your personal data is protected from misuse, loss and from unauthorised access, modification or disclosure.

If we no longer need your personal data for any purpose for which the information may be used or disclosed or required by law, we will take reasonable steps to destroy the information or ensure that the information is de-identified.

**Access and correction of Personal Data**

You can request access to, or ask us to correct, personal data about you that we hold by making a request in writing to us. We will respond to your request within a reasonable period after the request is made.

**Resolving your Concerns**

If you wish to gain access or seek correction to your personal data, have complaints about a breach of the Privacy Law, or have any questions or concerns about how your personal information is handled, please address the issues to:

Privacy Officer

1/52 Newheath Drive

Arundel Q 4214

Email: [info@ezycheckin.com.au](mailto:info@ezycheckin.com.au)

We will respond to your request, complaint or inquiry within a reasonable period.

**CHANGES TO OUR PRIVACY POLICY**

We amend this Privacy Policy as our business requirements or the law changes.

For more information about privacy issues in Australia and protecting your privacy, visit the Office of Australian Information Commissioner’s website on [www.privacy.gov.au](http://www.privacy.gov.au)

**DEFINITIONS**

“We”, “Us”, “Our” mean collectively and individually, Virtech Pty Ltd and its related entities.