

Cook Beaumont Hospitality – Privacy Policy

1. Introduction

Cook Beaumont Hospitality Pty Ltd and its subsidiary and related companies (Cook Beaumont, we, us, our) operates a network of hotels, bars, bistros, accommodation venues and related hospitality businesses, including the provision of a customer loyalty program. This privacy policy explains how we collect, hold, use, disclose and manage your personal information.

By entering our venues, purchasing our goods, participating in our services or programs, or interacting with us (whether in person or online), you consent to your personal and/or sensitive information being collected, used and disclosed in accordance with the practices described in this Privacy Policy.

While always consistent with this Privacy Policy, the particular manner of collection, use and disclosure of personal and/or sensitive information and type of information collected may vary between venues managed by Cook Beaumont, depending on the specific venue, its operational capabilities and services provided (ie whether it is a licensed gaming venue).

We are committed to protecting your privacy and handling your personal and sensitive information in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles**.

We may update this policy from time to time. The most current version will be available at participating venues, or by contacting us via email.

2. What Personal Information We Collect

We may collect your personal information where you agree to the collection, or where we require the personal information to conduct our business (including compliance with relevant laws and regulations). The personal information we collect depends on your interactions with us. It may include:

Contact & Identification Information

- name, photograph, date of birth, address, phone number, email
- identification documents (e.g., driver licence, passport) where required by law or venue policy

Transaction & Interaction Information

- reservation details, accommodation history, ordering history
- food, beverage and service preferences
- event bookings and guest information

- payment details (credit card, bank account)

My Local Rewards Information

- membership details, voucher usage, benefit redemptions
- engagement history, preferences and behavioural insights

Security & Compliance Information

- CCTV footage
- biometric information (e.g., facial or vehicle recognition templates) where used for venue safety, operational improvement, or regulatory compliance, but solely in connection to licensed gaming venues.
- information relating to gaming transactions or self-exclusion programs (where applicable in VIC/QLD)

Digital & Technical Information

- IP address, device identifiers, browser type, operating system
- location data when using venue Wi-Fi or mobile apps
- cookie and pixel data

Employment Information

- CV, employment history, qualifications, references

3. Sensitive Information

We generally do not collect sensitive information unless reasonably necessary (e.g., allergy information, emergency situations, employment applications, or where captured incidentally through FRT or biometric systems). Sensitive information will only be collected and used with your consent or where permitted by law.

4. How We Collect Personal Information

We collect personal information directly from you when you:

- make a booking or attend a venue
- join My Local Rewards or subscribe to communications
- stay at an accommodation venue
- book or attend an event
- provide feedback or lodge a complaint
- interact with us on social media
- use our websites, apps or venue Wi-Fi
- participate in gaming-related transactions (where applicable at licensed gaming venues)
- apply for employment

We may also collect your personal information from indirect sources, including:

- other operated entities
- service providers and contractors
- technology providers (e.g., reservation, ordering, payment systems)
- publicly available sources
- gaming self-exclusion scheme providers (where applicable at licensed gaming venues)
- referees or previous employers

We may derive new information about you by analysing data we hold, including insights into your preferences and behaviours.

5. Facial Recognition Technology

We may use facial recognition technology (**FRT**) within our venues for purposes authorised by law, including, but not limited to, security, identity verification, compliance with legal and regulatory obligations (such as age verification, managing barred patrons and enforcing self-exclusion), and the prevention and detection of unlawful or prohibited conduct.

FRT may collect and process biometric information to identify or verify an individual's identity. Biometric information is handled with a high level of security and care. It is retained only for as long as necessary to fulfil the purposes for which it was collected or as required by law, after which it is securely destroyed or de-identified.

Where FRT is in use at any of our venues, we will provide clear and prominent notification at venue entry points, informing patrons of the use of FRT as follows:

- Biometric information is collected through FRT. That information is used for purposes including:
 - a. Ensuring the safety and security of patrons, staff, and property;
 - b. Verifying identity for age-restricted areas or activities;
 - c. Supporting responsible gambling initiatives and regulatory obligations, including self-exclusion programs; and
 - d. Complying with other legal and regulatory requirements.

By entering our licensed gaming venues, you acknowledge that FRT is in use for the purposes described.

Cook Beaumont will only use FRT at licensed gaming venues. FRT will not be used at any other venues or locations managed by Cook Beaumont.

6. Cookies and Digital Tracking

When you visit our website or engage with our digital applications, we may collect personal information through your activities, system logs, and analytical tools (such as cookies and pixel tags).

We use cookies, pixel tags and similar technologies to:

- operate and improve our websites, apps and Wi-Fi
- understand usage patterns

- personalise content and offers
- collect information for aggregation and analysis
- support security and fraud prevention

You may disable cookies in your browser, but some features may not function properly or work at all.

7. How We Use Personal Information

We use personal information to:

- manage bookings, reservations and accommodation
- provide food, beverage and hospitality services
- administer My Local Rewards
- verify identity and process payments
- maintain venue, patron and employee safety
- manage events and functions
- conduct promotions, competitions and marketing
- obtain feedback and conduct research
- improve our services, venues, websites and apps
- undertake data analytics and business development
- comply with legal and regulatory obligations
- assess employment applications

If you do not provide certain information, we may be unable to provide services or interact with you effectively.

8. Direct Marketing

We may use your personal information to send marketing communications about:

- Cook Beaumont venues and services
- My Local Rewards benefits and offers
- events, promotions and competitions
- partner offers that may be relevant to you

Communications are generally sent via email, SMS, phone, social media or other channels.

You may opt out at any time using the unsubscribe function or by contacting us.

9. Disclosure of Personal Information

We may disclose personal information to:

- Cook Beaumont group entities
- service providers and contractors (e.g., technology, analytics, marketing, event partners)
- auditors, insurers, legal and professional advisers

- potential purchasers of our business or assets
- law enforcement bodies, liquor and gaming regulators, or as required by law
- Partners or affiliates assisting in the supply of goods/services or operation of membership or loyalty programs
- third parties where you have consented or where disclosure is permitted or required by law

We may also disclose anonymised or aggregated information for business or marketing purposes.

10. Overseas Disclosures

Some recipients of your personal information (for example service providers, data hosting, analytics, or communication service providers) may be located outside Australia, including in **China, India and Canada**. We take reasonable steps to ensure overseas recipients handle personal information with due diligence and implement appropriate safeguards to protect unauthorised disclosure of information.

11. Retention & Security

Information is stored in controlled environments accessible only by authorised personnel and electronically in secure databases, including those managed by third-party storage and analytics providers, which may be located in Australia or overseas. We will take reasonable steps to ensure that these providers comply with the Privacy Act (as required) and otherwise maintain appropriate security measures to protect your personal information. We will take reasonable steps to protect personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure. Personal information that is no longer required will be destroyed or de-identified unless retention is required by law.

12. Access, Correction and Your Rights

You have the right to seek access to the personal information we hold about you, to request correction of information that is inaccurate, incomplete, out-of-date, irrelevant or misleading, or to request further information about our privacy practices.

If you wish to exercise these rights, please contact Cook Beaumont in writing using the details in clause 13. We may need to verify your identity before acting on any such request.

We will respond within a reasonable period, and may charge a reasonable fee for access where allowed by law. In limited circumstances permitted by law, we may refuse access. A written explanation of any such refusal will be provided within a reasonable time frame on request.

13. Contacting Cook Beaumont

For privacy enquiries, access or correction requests, opt-outs or complaints, contact:
hello@mylocalrewards.com.au

14. Privacy Complaints

Privacy complaints will be:

- acknowledged within 7 days
- investigated promptly and confidentially
- resolved within 30 days where possible

If you are dissatisfied with our response, you may contact the **Office of the Australian Information Commissioner (OAIC)**.

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