



**DESTINATION
MELBOURNE**

Destination Melbourne

Privacy Policy

THIS POLICY IS EFFECTIVE FROM 4 APRIL 2019

STATEMENT REGARDING PRIVACY POLICY

Destination Melbourne Limited recognises the importance of protecting the privacy of personally identifiable information collected about our customers. For the purposes of this Privacy Statement, the word customers includes visitors to our websites, subscribers to, and users of our services, consumers of our products and customers that advertise in our products. Company Services can include the DM Hub online portal, communication via our websites, industry newsletter, e-direct mail, social media sites, event invitations, consumer promotions and competitions, industry surveys and other activity of similar nature. The use of the words “us”, “we”, “our” or “DM” means Destination Melbourne Ltd (ABN 39 110 657 264). We are bound by the Australian Privacy Principles in the *Privacy Act 1988* (Cth) in relation to the handling of personal information.

PERSONAL INFORMATION

Personal information is collected when we provide our products/services/communications to you. Generally we will inform you as to why we are collecting information when we collect it and how we plan to use it. We usually collect personal information directly from you although, at times we may use agents or service providers to do this on our behalf. We may acquire lists from other sources, both from other companies and from other public documents. We may automatically collect personal information by collecting and tracking the unique device identifier or the universally unique identifier of the devices you use to access our services. We may record the actions of our website users through session recordings. Personal information is not displayed in these recordings.

WHAT INFORMATION DO WE COLLECT

Destination Melbourne Ltd collects the personal information needed to provide Company Services and for our business operations. If you choose not to provide certain personal information to us, we may not be able to provide you with the services you require. The main types of personal information collected by DM and the main purposes for which they are collected, include:

Registration Information is the information you provide to us in the course of registering for or acquiring a Company Service, for example, to create an account, become a subscriber, become an advertiser, post comments, receive a newsletter, or enter a competition. Registration Information may include, for example, name, delivery or postal address, email address, gender and birthday. It includes additional information which you provide to Destination Melbourne Ltd in the course of that relationship. Where possible you may have the option of interacting with us anonymously (for example when browsing our digital products as a casual user) or using a pseudonym. We will usually make it clear whenever this is an option.

Public Information and Posts consist of comments or content that are displayed using our services and the information about you that accompanies those posts or content, which may include a name, user name, comments, likes, tweets, status, profile information and picture(s). Public Information and Posts are always public, which means they are available to everyone and may be displayed in search results on external search engines.

Information from third party Social Media. When you access our Services through third party social media services or when you connect a DM Service to third party social media services, you are authorizing us to collect, store use and disclose such information and content in accordance with this Privacy Policy. If you access or log-in to a DM Service through a third party social media service or connect a DM Service to a third party social media service, the information we collect may include your user ID and/or user name associated with that social media service. Any information or content you have permitted the third party social media service to share with us, such as your profile picture, email address, followers or friends lists, and any information you have disclosed in connection with that social media service will be collected. We do not collect your passwords other than in relation to our own services.

Activity Information – cookies and other technologies. When you access and interact with the Destination Melbourne websites, social media channels or DM Hub online portal, we may collect certain information about those visits. For example, in order to permit your connection to our Services, our servers receive and record information about your computer, device, and browser, including potentially your IP address, browser

type, and other software or hardware information. If you access the Company Services from a mobile or other device, we may collect a unique device identifier assigned to that device in regards to geolocation data, or other transactional information from that device.

Cookies and other tracking technologies (such as browser cookies and local storage, pixel beacons, and Adobe Flash technology including cookies) are comprised of small bits of data or code that often include a de-identified or anonymous unique identifier. Websites, apps and other services send this data to your browser when you first request a web page and then store the data on your computer so that such websites, apps and other services can access information when you make subsequent requests for pages from that service. These technologies may also be used to collect and store information such as pages you have visited, content you have viewed, search queries you have run and advertisements you have viewed in relation to your usage of Destination Melbourne Ltd Services and other websites you have visited.

Third parties that support Destination Melbourne Ltd Services by serving advertisements or providing services, such as allowing you to share content or tracking aggregate Destination Melbourne Ltd Services usage statistics, may also use these technologies to collect similar information. Destination Melbourne Ltd does not control these third-party technologies and their use is governed by the privacy policies of those third parties using such technologies.

Most browsers are initially set to accept cookies, but you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information. Users can manage the use of Flash technologies, with the Flash management tools available at Adobe's website. Please note that by blocking any or all cookies you may not have access to certain features, content or personalization available through the Destination Melbourne Ltd Services.

When you visit our services, our Internet Service Provider (ISP) makes a record of your visits and logs the following information for statistical purposes – your server address, your top-level domain name, the date and time of your visit to the site, the pages accessed and documents downloaded, the previous site visited and the type of browser used.

Information from other sources. We may supplement the information we collect with information from other sources, such as commercially available sources and data providers, as well as information from our business partners or related and affiliated companies in Australia or internationally.

We may disclose your personal information in order to comply with Australian or foreign law.

HOW DO WE USE YOUR INFORMATION?

We use the information we collect from and about you to provide the services and features to you, including: to measure and improve those services and features; to improve your experience with both online and offline services by delivering content DM believes you are likely to find relevant and interesting. This includes advertising and marketing messages; to allow you to comment on content, and participate in competitions; to provide you with customer support and to respond to inquiries. When you are not reasonably identifiable in relation to the information collected from or about you, we may use that information for any purpose or share it with third parties. We may also de-identify the information we collect about you so that we can use and disclose it without using or revealing any personal information about you.

We may also use the information we collect from and about you for these additional purposes:

To provide Destination Melbourne Ltd Services to you. We will use your information to provide our services to you, to fulfill administrative functions associated with these services (for example billing, credit and account management), to enter into contracts with you or third parties and for marketing and client relationship purposes. Where your information is contained within an advertisement which DM publishes for you, we may also use your information for publication of that same advertisement in other media, in accordance with the terms and conditions applicable to the initial publication of the advertisement. We may also use your information to improve our services including through research and data analysis by us and our service providers. We may use and disclose your personal information in other ways expressly disclosed

at the point of collection. If you are a competition winner we may disclose your information to relevant regulatory authorities and publish your details in accordance with the competition terms.

To allow service and content providers to assist us in providing and managing the Destination Melbourne Ltd Services. We may make your information available to certain third party service and content providers, such as providers of data cloud services, website hosting service providers, debt collection services and direct marketing services, who help us manage or provide our services or provide us with related services. These third parties may be located in a range of different. We generally require these service and content providers to comply with relevant privacy laws and not to use personal information which DM provides for any purpose other than the specific service they are providing to you and/or Destination Melbourne.

To allow social sharing functionality. If you log in with or connect a social media service account with Destination Melbourne Ltd Services, we may share your user name, picture, tweets and likes, as well as your activities and comments with other DM users and with your friends associated with your social media service. We may also share the same information with the social media service provider. By logging in with, or connecting your DM Services account with a social media service, you are authorizing us to share information we collect from and about you with the social media service provider, other users and your friends and you understand that the social media service's use of the shared information will be governed by the social media service's privacy policy. If you do not want your personal information shared in this way, please do not connect your social media service account with your Destination Melbourne account and do not participate in social sharing on DM's Services.

To provide co-branded services and features. We may offer co-branded services or features, such as competitions or other promotions together with a third party ("Co-Branded Services"). These Co-Branded Services may be hosted on DM Services or on the third party's service. By virtue of these relationships, we may share the information you submit in connection with the Co-Branded Service with the third party. The third party's use of your information will be governed by the third party's privacy policy. We will advise you when this is occurring or obtain your express consent to share your personal information in these circumstances.

To contact you. Destination Melbourne Ltd may use your personal information for the following purposes:

- + Answering Queries: If you have contacted us with a query or request, we will use your personal information to respond to that query or request;
- + Informing you of special offers and relevant developments: If you subscribe to receive information from us in the form of a newsletter or emailed updates, or a feed via a social networking service, we will use your contact information to send that information to you from time to time. The information may take the form of general communications which simply allow us to "keep in touch" with you, or may be direct marketing material which contains special promotions and special offers;
- + Inviting participation: From time to time we will use your personal information to ask you to participate in surveys and competitions.
- + Displaying Comments/Reviews: If you submit a comment or a review, we have the right to display that comment or review in our marketing material, along with your first initial and surname, although we will not publish your email address;
- + Competition Administration: If you win a prize in one of our competitions, we will use your personal information to notify you, and will publish your name as the winner if required to do so by law.

USAGE ANALYSIS

We use the results from our surveys and Google analytics data to generate a holistic but anonymous picture of our member base and usage patterns. This information allows us to analyse trends and demographics and helps us to improve the Program.

TRANSFER OF ASSETS

At some point in the future, we may decide to transfer the assets of our organisation as part of a restructuring process or a sale. Our customer or user database would be included in this transfer. We would only transfer this database as part of a going concern so that the new owners could continue to provide services to you. The new owners would also be bound by the terms of this Privacy Policy unless you reach a separate agreement with them. We would not sell our member or user database separately from our other assets.

TO PROTECT THE RIGHTS OF DESTINATION MELBOURNE LTD AND OTHERS

There may be instances when Destination Melbourne Ltd may disclose your information, including situations where DM has a good faith belief that such disclosure is necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of DM, our employees, agents and contractors (including enforcement of our agreements and our terms of use); (ii) protect the safety, privacy, and security of users of the DM Services or members of the public; (iii) protect against fraud or for risk management purposes; (iv) comply with the law or legal process in any country; or (v) respond to requests from public and government authorities.

OTHER

We may also disclose your personal information where required or necessary under the provisions of the *Privacy Act 1988* (Cth) (e.g. if it is necessary to prevent a serious threat to public safety etc).

HOW DO WE PROTECT YOUR INFORMATION?

Destination Melbourne Ltd uses commercially reasonable administrative, technical, personnel and physical measures to safeguard information in its possession against loss, theft and unauthorized use, disclosure or modification. However, no one can guarantee the complete safety of your information.

HOW CAN YOU ACCESS YOUR INFORMATION?

If you would like to access, review, correct or update your personal information, you may contact us as outlined in the "How You Can Contact Us" section at the end of this policy. In your request, please include your email address, name, address, and telephone number and specify clearly what information you would like to access, review, correct or update. We may need to share your information with others who can assist in responding to your request. We will try to respond to your request as soon as reasonably practicable. If we deny access in any circumstances we will generally tell you why.

HOW CAN YOU OPT OUT?

We do not disseminate spam, as we only send information to people who have requested it. If you have requested information from us in the past, but have now changed your mind, please either:

- + click on the "unsubscribe" link in any one of our communications (if available);
- + or for social networking services, set your preferences so that you do not receive messages from us any more (e.g. stop "following" us);
- + reply to any of our email messages using the word "unsubscribe" in the heading; or send an email to info@destination.melbourne

There is no charge associated with being removed from our mailing or communications list.

You can block or delete cookies through your browser settings but be aware that if you do this you may not be able to continue to receive some Destination Melbourne Ltd Services. In addition, this may not be sufficient to block or opt-out of all activities which track the usage of a device or which deliver targeted content.

If you have installed a mobile app and you wish to stop receiving push notifications, you can change the settings either on your mobile device or through the app.

If you have linked any of your social media accounts to your account for any DM Services, you can cancel that link by changing your account settings.

OTHER IMPORTANT INFORMATION FOR YOU

Updates to Privacy Policy. Destination Melbourne Ltd may modify this Privacy Policy at any time. Please look at the Policy Effective Date at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the DM Website. If the changes affect any agreement between us, you will be entitled to terminate our agreement if those changes are not acceptable to you, on reasonable grounds.

Location of Data. The disclosures of information may involve transmitting, storing or processing information across national borders. This includes (amongst other things): our right to host the web site on servers located in countries other than Australia (including the United States); our right to conduct usage analysis; and our right to process payments. You consent to the transmission of data for these purposes.

DM Hub. If you are a registered member of the DM Hub, please sign out once you have finished using our website and close your browser (e.g. Internet Explorer, Mozilla Firefox or Apple Safari). This ensures that no one else can access your personal information after you.

Linked Services. The DM Services may also be linked to sites operated by unaffiliated companies, and may carry advertisements or offer content, functionality, games, newsletters, competitions or applications developed and maintained by unaffiliated companies. Destination Melbourne Ltd is not responsible for the privacy practices of unaffiliated companies, and once you leave the DM Services or click an advertisement you should check the applicable privacy policy of the other service.

Collection of Personal Financial Information by a Payment Service. In some cases, we may use an unaffiliated payment service to allow you to purchase a product or make payments ("Payment Service"). If you wish to purchase a product or make a payment using a Payment Service, you will be directed to a Payment Service webpage. Any information that you provide to a Payment Service will be subject to the applicable Payment Service's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, any Payment Service's use of information collected through any Payment Service.

Data Retention. We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

Remember that even after you cancel your account, copies of some information from your account may remain viewable in some circumstances where, for example, you have shared information with social media or other services. Because of the nature of caching technology, your account may not be instantly inaccessible to others. We may also retain backup information related to your account on our servers for some time after cancellation for fraud detection or to comply with applicable law or our internal security or other policies. We do not always completely remove or delete all of your information for a number of reasons including due to technical and systems constraints, contractual, financial or legal requirements.

Sensitive Information. We ask that you not send us, and you not disclose, any sensitive personal information (such as information related to racial or ethnic origin, religion or other beliefs, health, criminal background or trade union membership) on or through the DM Services or otherwise. If, contrary to this request, you do provide any sensitive information, in doing so you consent to us collecting and handling that information in accordance with this Privacy Policy.

Complaint. If you think we have breached the Privacy Act or other applicable privacy laws, you may complain to us by contacting us as outlined in the "How You Can Contact Us" section at the end of this policy. When you contact us, please include your email address, name, address, and telephone number and clearly describe your complaint. We will need to share your information with others who can assist in responding to your complaint. We will respond to your complaint as soon as reasonably practicable and in any event within 5 business days, by making contact with you to inform you whether we have accepted your complaint, need further information or do not think we are in breach. We will also let you know the next steps in resolving your complaint. If you are not satisfied with our response to your complaint, or at any time, you may refer your complaint to the Office of the Australian Information Commissioner (www.oaic.gov.au).

HOW YOU CAN CONTACT US

If you have questions about this Privacy Policy, please contact our Office Manager at:

Office Manager, Destination Melbourne
Level 12, 50 Queen Street, Melbourne VIC 3000

E: info@destination.melbourne

T: +61 3 9869 2444