

## Good Times Pub Group Privacy Policy

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**GOOD TIMES PUB GROUP** is committed to protecting the Personal Information it collects, and is bound by The Australian Privacy Principles (APPs). This Privacy Policy outlines the way in which we handle your Personal Information:

### **1. APP1 – Open and transparent management of personal information**

1.1 This document forms part of open and transparent management systems the Good Times Pub Group use to manage customers' personal information. Our privacy statement is available to all customers' upon written request. We will only collect, use or disclose personal information in accordance with The Australian Privacy Principles.

### **2. APP2 – Anonymity and pseudonymity**

2.1 The Good Times Pub Group comprises of eight licenced venues across South East Queensland. Due to the nature of our business, it is not possible for customers to purchase some of our products or services, or participate in onsite promotions, by remaining anonymous. Only where required, we will collect personal information from you directly and from your use of our products and services at venues.

### **3. APP3 – Collection of solicited personal information**

3.1 We collect the information you give us directly when you complete entry forms, or make an enquiry. We ask for Personal Information about you such as your name, birth-date, postal address, e-mail address, and telephone number. We may also collect information from your use of some of our products or services, including attendance at venues or when you visit our web sites:

<http://goodtimespubgroup.com.au/>

[www.burnsidetavern.com.au](http://www.burnsidetavern.com.au)

[www.thetavern.com.au](http://www.thetavern.com.au)

[www.centralparktavern.com.au](http://www.centralparktavern.com.au)

[www.australianhotelboonah.com.au](http://www.australianhotelboonah.com.au)

[www.dugandanhotel.com.au](http://www.dugandanhotel.com.au)

[www.australianhoteldalby.com.au](http://www.australianhoteldalby.com.au)

[www.westbrooktavern.com.au](http://www.westbrooktavern.com.au)

[www.tarampahotel.com.au](http://www.tarampahotel.com.au)

3.2 We may supplement the information that you provide with information that is received from third parties. For instance, if inaccurate postal or zip codes are received, we will use third party software to fix them.

- 3.3 From time to time we may also collect Personal Information from rented mailing lists of potential customers or by way of joint marketing efforts with affiliates.
- 3.4 We may also collect your Personal Information where we are required to do so by law.

#### **4. APP4 – Receiving unsolicited information**

- 4.1 Our business does not use or collect unsolicited personal information. Customers providing their details have provided them directly or in limited cases by way of joint marketing efforts with affiliates or list rental from specifically selected companies. Customers are made aware that their details are shared with us via Terms and Conditions.

#### **5. APP5 – Notification of the collection of personal information**

- 5.1 Once we receive customers' details we collect and process Personal Information for specific use and limited purposes primarily to let you know about other products or services you may be interested in.

#### **APP6 – Use or disclosure of personal information**

- 6.1 We process your Personal Information only for specific and limited purposes. We ask only for data that is adequate, relevant and not excessive for those purposes. Some of these purposes include the following:
  - (a) We may contact you occasionally to inform you of new services we will be providing, or special offers, events or articles we think will be of interest to you.
  - (b) We may send you regular updates by e-mail or by post.
  - (c) We may send you requested product information and promotional material.
  - (d) We may use your Personal Information for marketing purposes and market research.
  - (e) We may use your Personal Information internally to help us improve our products and services and to help resolve any problems.

- 6.2 We do not share, sell or distribute your Personal Information with unrelated third parties, except under these limited circumstances:
- (a) Personal Information may be transferred to third parties who act for or on behalf of the Good Times Pub Group, or in connection with the business of the Good Times Pub Group for further processing in accordance with the purposes for which the data was originally collected or for purposes to which you have subsequently consented. For example, sometimes a third party may have access to your Personal Information in order to handle our mailings or fulfilment services on our behalf.
  - (b) Unless otherwise requested by you, Personal Information may be disclosed to carefully screened companies or affiliates whose products or services may be of interest to you as part of our list rental program.
  - (c) We may share or transfer the information in our databases to comply with a legal requirement, for the administration of justice, to protect your vital interests, to protect the security or integrity of our databases or our web sites, to take precautions against legal liability, or in the event of a corporate sale, merger, re-organisation, dissolution or similar event.
  - (d) If a Government body or any such organisation require details from us on your behalf, written consent of the individual to whom the information relates may be required.
- 6.3 Where appropriate, before disclosing Personal Information to a third party, we contractually require the third party to take adequate precautions to protect that data.

## **7. APP7 – Direct Marketing**

- 7.1 Direct Marketing forms a component of our business and as such we have strict guidelines and systems in place to select only appropriate customers for our mailings. Guidelines include the exclusion of customers under the age of 18 from all promotional mailings.
- 7.2 Customers may request the source of the information we have about them including where the source is another organisation simply by providing a written request to the relevant GTPG venue or by writing to The Privacy Officer at: **Privacy Officer, Good Times Pub Group, 36 Industrial Ave, MOLENDINAR QLD 4214.**
- 7.3 You may “opt out” of any Direct Marketing promotion simply by providing a written request to the relevant GTPG venue or by writing to The Privacy Officer at: **Privacy Officer, Good Times Pub Group, 36 Industrial Ave, MOLENDINAR QLD 4214.**

## **8. APP8 – Cross-border disclosure**

- 8.1 Our business is part of a national enterprise which does not transfer Personal Information outside of Australia.

## **9. APP9 – Government related identifiers**

- 9.1 Our business does not use any Government related identifiers.
- 9.2 All customers are recognised by a personalised account/customer number.
- 9.3 Enquirers are assigned a temporary number when requested information is first sent to them, if they respond; this number will then convert into a customer number.

## **10. APP10 – Quality of personal information**

- 10.1 We strive to maintain the reliability, accuracy, completeness and currency of Personal Information in our databases and to protect the privacy and security of our databases.
- 10.2 New customers are sourced largely through internal promotions. All of our data is merge purged and checked for invalid addresses, matches with our current customer database and duplicates within the files being processed. We use a variety of in-house custom built routines that are maintained and enhanced by our active in-house IT development team.

- 10.3 Customers are required to reconfirm their Personal Information (such as address and telephone number) for each promotion they enter. If a customer returns a change of address notification only, a CSO (Customer Service Officer) or a Data Entry staff member amends the customer's file within a 30 day time period. If a customer includes change of address details with an entry form, the address update is completed at the same time the entry is processed.
- 10.4 All returns are flagged in the database. Any customer issues are handled by our CSO's who have the opportunity to close and refund accounts, flag customers, contact and correspond with customers for further details. Any resultant changes to customer or order attributes are captured and actioned accordingly.
- 10.5 The system also looks for any inconsistencies and suspends the orders until a CSO addresses the issue. In addition, we have routines that look for possible duplicate customers either automatically merges the customers or presents this candidate duplicate names to data entry staff member for their decision.

## **11. APP11 – Security of personal Information**

- 11.1 Personal Information is stored in secure premises where unauthorised access is prevented such as back office of venues which are not accessible to the general public through, automatic locking doors during business hours and electronic and private surveillance outside business hours.
- 11.2 We strive to maintain the reliability, accuracy, completeness and currency of customer information in our databases and to protect the privacy and security of our databases.
- 11.3 Our servers and our databases are protected by industry standard security technology, such as industry standard firewalls and password protection. We are currently in the process of building a hardened set of web servers.
- 11.4 Sometimes we process sensitive data that requires industry standard Secure Socket Layer (SSL) encrypted browsers. We use 128-bit encryption or better to protect transmissions over the Internet.
- 11.5 We are compliant with the Payment Card Industry (PCI) for all credit card handling. In addition the storage of the columns that store credit card numbers in ADMS are encrypted using ORACLE TDE technology.
- 11.6 The employees who have access to Personal Information have been trained to handle such data properly and in accordance with our security protocols (including privacy breaches), and strict standards of confidentiality. Although we cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data, we take reasonable precautions to prevent such unfortunate occurrences.

## **12. APP12 – Access to personal Information**

- 12.1 Upon receipt of your written request and enough information to permit us to verify your identity and identify your Personal Information, we will disclose to you the Personal Information we hold about you. We will also correct, amend or delete any Personal Information that is inaccurate.
- 12.2 This Privacy Policy has been distributed amongst all GTPG management staff and is readily available to all other staff members. A customer may request to view a copy of this document either electronically or via hard copy. A copy of this Privacy Policy is displayed on our websites - <http://goodtimespubgroup.com.au/>
- 12.3 If you do not wish to receive information from us and want to be removed from our standard mailing lists please write to: **The Privacy Officer, Good Times Pub Group, 36 Industrial Ave, MOLENDINAR QLD 4214** and indicate your choice.

## **13. APP13 – Correction of Personal Information**

- 13.1 Upon receipt of your written request and enough information to permit us to verify your identity and identify your Personal Information, we will correct, amend or delete any Personal Information that is inaccurate or out of date. Incomplete details will be amended per your request. We do not collect or hold information about you that may be potentially misleading or irrelevant to our dealings with you.
- 13.2 Information integrity is maintained through various internal processes. Our Marketing department uses a merging program that automatically outputs customers who might be in the system twice or more so that we can correctly choose the right address and merge the duplicates together. CSO's also look for duplicate customers when processing queries as part of general housekeeping. Personal information is also verified with customers in routine correspondence.
- 13.3 If you wish to access or correct your Personal Information, or you suspect a privacy breach, please write to The Privacy Officer, Good Times Pub Group, PO Box 6944, GCMC QLD 9726 AUSTRALIA. We do not charge for complying with a correction request, however, for all other requests, we may charge a small fee to cover our costs. Requests to delete Personal Information or investigate a potential breach are subject to any applicable legal and ethical reporting or document retention obligations imposed on us.

- 13.4 Consistent with our Complaints Handling Policy, we constantly set high standards of customer service and will respond to requests for correction of personal details or privacy breach concerns within 30 days in writing. Should your request to change your personal information be denied, you will be notified of the grounds for the refusal and be given the opportunity to respond. Any privacy breach concerns will be investigated and responded to in writing.
- 13.5 We will also make provision to update other relevant parties of your corrected Personal Information where applicable.

#### **14. CONCLUSION**

If you have any questions about this Privacy Policy or concerns about the way we process your Personal Information, please contact us by e-mailing us at [General\\_Enquiry@morrisint.com.au](mailto:General_Enquiry@morrisint.com.au) or write to **The Privacy Officer, Good Times Pub Group, 36 Industrial Ave, MOLENDINAR QLD 4214.**