

PRIVACY POLICY

PURPOSE

Mount Wellington Licensing Trust (MWLT) is committed to protecting your personal information. The Privacy Act 2020 (Privacy Act) governs how information may be collected, held, used, and disclosed. This policy explains how Mount Wellington Licensing Trust (MWLT) complies with the Privacy Act.

POLICY

This Privacy Policy, that should be read in conjunction with the New Zealand Information Privacy Principals, sets out:

- Why we collect and hold your personal information
- What types of personal information we collect from you
- How we collect your personal information
- How we may share your personal information
- How, and for how long, we hold your personal information
- How you can access, change, or update your personal information

Collecting and holding your personal information

Why we collect and hold your personal information will depend on how and why that information was originally gathered by us from you. We will not collect, hold, use, or disclose your personal information other than for the purpose for which it was collected, for a purpose that is reasonably apparent at the time we collect it, or as otherwise required or specifically permitted by law.

What types of personal information we collect from you and why we collect and hold your personal information will depend on how we deal with you and why that information was gathered by us from you. The table below outlines a non-exhaustive list of these circumstances:

How we deal with you	What types of personal information we may collect from you	Why we collect and hold your personal information
The provision of goods or services <ul style="list-style-type: none">• Restaurant, Pub, Hotel Accommodation and Conference Bookings• Gambling services• TAB services	<ul style="list-style-type: none">• We may ask you to provide us with personal information, including your name, contact details, details of your travel agent, payment information, documents to verify your age or identity	<ul style="list-style-type: none">• So that we can provide services and products to you• So that we can identify you, your requirements, and to contact you if required• To obtain payment for the provision of goods or services• To help us understand your preferences so we can deliver exceptional service• To enable our contractors and service providers to support us in the provision of the products or services you have requested

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How we deal with you	What types of personal information we may collect from you	Why we collect and hold your personal information
<p>Marketing</p> <ul style="list-style-type: none"> • Marketing campaigns • Newsletters • Competitions or promotions 	<ul style="list-style-type: none"> • We may ask you to provide us with personal information, including your name, contact details, or details of your travel agent 	<ul style="list-style-type: none"> • For the purposes of marketing our business • To contact you and/or identify if you have won a prize
<p>Our websites</p> <ul style="list-style-type: none"> • Our websites use cookies to help personalise your online experience 	<ul style="list-style-type: none"> • Domain name or IP address • Access date and time • Websites you are visiting from • Search terms used • Time spent on the website • Pages visited • Web browser, operating system, and device type • Geographic and demographic information 	<ul style="list-style-type: none"> • To collect, store, and track information for statistical purposes
<p>Regulatory Bodies</p> <ul style="list-style-type: none"> • Some of our activities are monitored by regulatory bodies including, but not limited to, the Department of Internal Affairs, Gambling Commission, Inland Revenue Department, The Alcohol Regulatory and Licensing Authority and police • As a class 4 venue operator we have an obligation to know our customers 	<ul style="list-style-type: none"> • We may seek personal information from you about your financial circumstances and/or the source(s) of your funds/wealth 	<ul style="list-style-type: none"> • As required or authorised by law • To ensure that we know our customers and can meet our regulatory obligations • To assist in limiting the harm of problem gambling in the community
<p>Video Surveillance</p> <ul style="list-style-type: none"> • We have surveillance cameras monitoring our venues • These cameras monitor and record activity both on and in the surrounding areas of our premises 	<ul style="list-style-type: none"> • We may retain surveillance footage, which may include image, audio, and video recordings of you • We may use photographs of you (either provided by you or collected by MWLT) 	<ul style="list-style-type: none"> • For regulatory and security purposes • For the purposes of identifying customers who are subject to an exclusion or barring order

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How we collect your personal information

We collect your personal information in a number of ways. We will try to collect your personal information directly from you; however, sometimes we may collect your personal information from third parties that you have authorised to provide such information to us, or that are required to provide such information in accordance with the law.

Some of the ways we collect personal information about you is when you:

- Make a booking with us
- Visit our premises
- Register to enter a competition or promotion or to receive our newsletters or other marketing material
- Complete one of our surveys or provide feedback to us about your customer experience
- Visit any of our websites or interact with us on social media
- Apply for a job with us
- Conduct a transaction which requires us to obtain your personal information for the purposes of complying with anti-money laundering and counter-terrorism financing laws
- Otherwise interact with us

Sometimes, we may collect your personal information from third parties, including:

- Booking agents who liaise with us to make bookings for goods, services, and facilities on your behalf
- Third parties that run competitions and other promotions for which we may be a sponsor or a participant
- Third parties that provide services from within our premises
- Third parties that provide us with marketing databases which you have opted into
- Regulatory authorities
- Google analytics
- Social media databases (including, but not limited to Facebook, Twitter, and Instagram)
- Recruitment agencies
- Fraud checking and/or credit reference agencies
- Other entities within the MWLT group

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How we may share your personal information

We may share your personal information with:

- Any third party engaged by us to provide products or services to you on our behalf, where your personal information is necessary for the provision of those products or services
- A third party if we are required to do so under any laws or regulations, or during legal proceedings or other investigations
- A third party, who may be based in other countries who provides data hosting services. We take all reasonable steps to ensure that any overseas recipients do not breach any of the obligations imposed under the Information Privacy Principles in relation to your personal information

Before we share your personal information, we will take reasonable steps to ensure that the information is accurate, up to date, relevant, and not misleading.

How, and for how long, we will hold your personal information

We will retain and use your personal information for the period necessary to comply with our legal obligations, resolve disputes, and enforce our agreements unless a longer retention period is required or permitted by law.

Once the retention period expires, personal information will be deleted. The right to access, change, update, or remove your personal information cannot be enforced after the expiration of the retention period.

We may use aggregated data derived from or incorporating your personal information after you update or delete it, but not in a manner that would identify you personally.

Your personal information is securely stored in our paper archives, our on-site databases and through cloud-based storage, some of which is managed by our external service providers. We restrict access to personal information to those individuals, or third parties, who need access to this information in order to assist us in delivering products and services to you and those individuals, or third parties, are required to maintain confidentiality at all times. Direct access to our physical and digital storage is restricted to ensure your data remains secure and protected and we use all reasonable means to protect your personal information securely against unauthorised use and access.

How you can access, change, or update your personal information

You have the right to access your personal information that we hold, and to have that information changed and/or updated. To access, correct, change, or update your personal information that we hold please email privacy@waipunahotel.co.nz.

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GENERAL POLICY GUIDELINES

- How we deal with you and/or how we collect your personal information may reference activities undertaken directly by MWLT, or one of MWLT's wholly controlled subsidiaries, Mount Wellington Trust Hotels, or Mount Wellington Charitable Trust
- We reserve the right to change this Privacy Policy at any time
- All changes will be notified by posting an updated version of the Privacy Policy on our website
- This policy will be reviewed and approved by the MWLT Board annually
- Last Updated: 18 April 2023