

PRIVACY POLICY

The Gladstone Area Promotion and Development Limited trading as Gladstone Area Promotion and Development Limited (GAPDL) is committed to protecting user privacy. We understand and appreciate that visitors and users of this website are concerned about their privacy and the confidentiality and security of any information that may be provided.

GAPDL is subject to the Information Privacy Act 2009 which requires that we comply with the Information Privacy Principles (IPPs) set out in the Act. The IPPs set out how Queensland Government agencies should collect, store, use and disclose personal information and how individuals can access and apply to amend documents containing their personal information.

When you visit a GAPDL website, our server makes a record of your visit and logs certain information for statistical purposes only. No attempt is or will be made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a power to inspect activity logs. When this policy mentions "GAPDL," "we," "us," or "our," it refers to GAPDL.

Personal information

The types of personal information that we collect will depend on the nature of your dealings with us. For example, we may collect personal information directly from you when you

- Subscribe to a newsletter or register to receive brochures;
- Enter a promotion conducted by GAPDL;
- Have business dealings with us.

In each case, we only collect the personal information that we need to carry out our specific functions.

Any personal information collected by GAPDL will only be made available to GAPDL personnel or approved contracted parties whose duties require them to use this information. Any personal information collected through this website will also be disclosed if required by law.

There are three general categories of information that we collect.

1. Information You Give Us

We collect information you share with us when you use the GAPDL website in order to ensure the adequate performance of contracts between you and GAPDL, or between you and a Supplier.

- i) Account Information: when you sign up for a GAPDL account or submit a request for Accommodation booking information, we require certain information such as your name and email address.
- ii) Profile Information: to use certain features within the GAPDL website, we may need to ask you to complete a profile, which may include your address and phone number.
- iii) Payment Information: when you use the Payment Services (such as when booking Accommodation or a travel-related experience through us or establishing a Supplier relationship via us), we require certain financial information (like your bank account or credit card information) to process payments and comply with applicable law.
- iv) Communications with GAPDL: when you communicate with GAPDL, we collect information about your communication and any information you choose to provide.
- v) Other Information: you may otherwise choose to provide us information (such as your itinerary, food allergies, emergency contact information, travel preferences, and information about other guests accompanying you on your stay) when you fill in a form, speak to, or otherwise communicate with a GAPDL representative, conduct a search, update or add information to your GAPDL account, respond to surveys, participate in promotions, or use other features of the GAPDL website.

2. Information We Automatically Collect from Your Use of the GAPDL Website

When you use the GAPDL website, we collect information about the services you use and how you use them, even if you don't sign up for a GAPDL account. We process this information for the activities and legal bases described in Section 2 below.

- i) Usage Information: we collect information about your interactions with the GAPDL website, such as the pages or

other content you view, your searches, bookings you have made, the experiences and activities you book with others through us, and other actions on the GAPDL website.

ii) Location Information: when you use certain features of the GAPDL website, we may collect different types of information about your general location (e.g. city, country).

iii) Log Data: we automatically collect log information when you use the website, even if you have not created a GAPDL account or logged in. That information includes, among other things: details about how you've used the GAPDL website (including if you clicked on links to third party applications), access times, hardware and software information, device information, device event information (e.g. browser type, crashes), unique identifiers, and the page you've viewed or engaged with before or after using the GAPDL website.

iv) Transaction Information: we collect information related to your transactions on the GAPDL website or transactions made through the GAPDL website, including the date and time, amounts charged, and other related transaction details.

v) Cookies and Similar Technologies: we use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. We may also allow our business partners to use these tracking technologies on the GAPDL website, or engage others to track your behaviour on our behalf. You may disable the usage of cookies through your browser settings. For more information on our use of these technologies, see our Cookie Policy.

3. Information We Collect from Third Parties

We may collect information that others provide about you when they use the GAPDL website, or obtain information from other sources and combine that with information we collect through the GAPDL website. GAPDL does not control, supervise or respond for how the third parties providing your information process your personal data, and any information request regarding the disclosure of your personal information to GAPDL should be directed to such third parties.

i) Third Party Services: if you link, connect, or login to your GAPDL account with a third-party service (e.g., Facebook, Twitter, Google), we may collect information from the third-party service, such as your registration and profile information. This information varies and is controlled by that service or as authorised by you via your privacy settings at that service.

ii) Other Sources: to the extent permitted by applicable law, we may receive additional information about you, such as demographic data. We may receive information about you and your activities on and off the GAPDL website, including about your interactions from our partner ad networks. For example, if you book a restaurant reservation through GAPDL, the restaurant may send information to us that you submitted to them, like your dining preferences or dining activity. We may receive information about you and your activities on and off the GAPDL website through partnerships, or about your experiences and interactions from our partner ad networks.

How We Use The Information We Collect

We use, store, and process information about you to provide, understand, improve, and develop the GAPDL website, and to create and maintain a trusted and safer environment.

1. Provide, Improve, and Develop the GAPDL website

i) Enable you to access and use the GAPDL website.

ii) Contact you about your booking requests, plan your itinerary, and make and manage your bookings.

iii) Enable you to communicate with Members.

iv) Operate, provide, improve and optimise the GAPDL website and experience, such as by performing analytics and conducting research.

v) Personalise or otherwise customise your experience by, among other things making Accommodation suggestions, ranking search results or showing ads based on your search or booking history, and any preferences you provide to us, or that are signified by your search and booking history.

vi) Enable you to access and use the Payment Services, including collecting payment on behalf of a supplier.

vii) Provide customer service.

viii) Send you service or support messages, such as updates, security alerts, and account notifications.

ix) If you provide us with your contacts' information, we may use and store this information: a) to facilitate your referral invitations, b) for fraud detection and prevention, and c) for any other purpose you authorise at the time of collection.

We process this information given our legitimate interest in improving the GAPDL website and our users' experience with it, and to ensure the adequate performance of our contract with you.

2. Create and Maintain a Trusted and Safer Environment

i) Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity.

ii) Conduct investigations and risk assessments.

iii) Verify or authenticate information or identification provided by you (such as to verify your Accommodation address or compare your identification photo to another photo you provide).

iv) Conduct checks against databases and other information sources.

v) Comply with our legal obligations.

vi) Resolve any disputes with any of our users and enforce our agreements with third parties.

vii) Enforce our Terms of Service, Member agreements, and policies.

We process this information given our legitimate interest in protecting the GAPDL website, to verify and ensure the adequate performance of our contract with you, and to comply with applicable laws.

3. Provide, Personalise, Measure, and Improve our Advertising and Marketing

i) Send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your communication preferences (including information about GAPDL or partner campaigns and services).

ii) Personalise, measure, and improve advertising.

iii) Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by GAPDL or its third-party business partners.

iv) Carry out profiling on your characteristics and preferences (based on the information you provide to us, your interactions with our services, and your search and booking history) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you.

We process this information given our legitimate interest in protecting the GAPDL website, to measure the adequate performance of our contract with you, and to comply with applicable laws.

Sharing & Disclosure

With Your Consent or Where Authorised by Law

i) We may share your information at your direction or as described by us to you at the time of sharing, such as if you have requested us to connect you with a third-party vendor or to purchase services from a third-party vendor on your behalf, in connection with your booking (e.g., an insurance provider or activities provider), or if you, as a supplier, have agreed to let us market your accommodation through, or refer you to, a third-party's platform. In these situations, you are authorising GAPDL to disclose to these third-party vendors information required to book them and to receive the relevant services from them. This could include special preferences or requests, and any additional guest information. These third-party vendors are not controlled by GAPDL and personal information shared with them is subject to their privacy policies and practices.

ii) We may also share certain contact details about you, such as your name, email and past reservations in GAPDL, to other companies and business partners of GAPDL, who may then send you marketing communications about products or services that may interest you.

Sharing between Customers and Suppliers

i) When you as a Customer submit a booking request, certain information about you may be shared with the Supplier to coordinate the booking, such as your name, contact details, and arrival date.

ii) When you as a Supplier have a confirmed booking, certain of information about you may be shared with the Customer to coordinate the booking, such as your full name, phone number, and Accommodation address.

iii) Your credit card details will only be used by GAPDL for the purpose of taking payment for GAPDL's or its affiliates'

goods and services and will not be disclosed to any other third party.

Sharing this information is necessary to provide Customers with our services, and we don't share your billing and payout information with other Members.

Reviews, Listings, and other Public Information

The GAPDL website publishes information that is visible to the general public. For example:

- i) Public Listing pages are publicly visible and include information such as the Accommodation's approximate or exact location, Listing description, calendar availability, and any additional information the Supplier chooses to share.
- ii) After completing a booking, Customers may write reviews which may appear publicly on Listing pages (and other pages on which we may market Accommodations) under their first name, last initial, and general location.
- iii) If you submit content on our blog, in a public forum, or in a social media post, or use a similar feature on the GAPDL website, that content is publicly visible.

Information you share publicly on the GAPDL website may be indexed through third party search engines. If you change your settings or your public-facing content, these search engines may not update their databases. We do not control the practices of third party search engines, and they may use caches containing your outdated information.

Service Providers

We use a variety of third party service providers to help us provide services related to the GAPDL website and ensure we can adequately provide you with our services. For example, service providers may help us: a) verify or authenticate your identification, b) check information against public databases, c) assist us with background checks, fraud prevention, and risk assessment, or d) provide customer service, advertising, or payments services. These providers have limited access to your information to perform these tasks on our behalf, and are contractually obligated to use it consistent with this policy.

Additional Services by Suppliers

Suppliers may use third party services available through the GAPDL website to assist with managing their Accommodation or providing additional services, such as cleaning services, insurance or activities providers. Suppliers may use features on the GAPDL website to share information about the Customer (like the Customer's check-in and check-out dates, name, phone number, and email address) with that third party service provider for the purposes of coordinating the stay, managing the Accommodation, or delivering other services.

Safety and Compliance with Law

GAPDL may disclose your information to courts, law enforcement or governmental authorities, or authorised third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary:

- i) to comply with legal process and to respond to claims asserted against GAPDL,
- ii) to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability,
- iii) to enforce and administer our Website Terms of Use or other agreements with Members,
- iv) for fraud investigation and prevention, risk assessment, customer support, product development and debugging purposes, or
- (v) to protect the rights, property or personal safety of GAPDL, its employees, its Members, or members of the public.

We will attempt to notify Members about these requests unless:

- i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or
- ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon GAPDL's property, its Members and the GAPDL website (collectively, "Risk Scenarios").

In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that Member about the request after the fact if we determine in good faith that we are no longer legally prohibited from

doing so and that no Risk Scenarios apply.

Tax Authorities

In jurisdictions where we facilitate the collection and remittance of occupancy taxes, Customers and Suppliers expressly grant us permission, without further notice, to disclose Customers' and Suppliers' data and other information relating to them or to their transactions, bookings, Accommodations and occupancy taxes to the relevant tax authority, including, but not limited to, the Customer's or Supplier's name, listing addresses, transaction dates and amounts, tax identification number(s), the amount of taxes received (or due) by Suppliers from Customers, and contact information.

Aggregated Data

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other de-identified information for industry and market analysis, regulatory compliance, demographic profiling, marketing and advertising, and other business purposes.

Other Important Information

Analysing your Communications

We may review, scan, or analyse your communications on the GAPDL website for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyse messages to mask contact information and references to other websites. In some cases, we may also scan, review, or analyse messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. However, occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyse your communications to send third party marketing messages to you, and we will not sell reviews or analyses of these communications. These activities are carried out based on GAPDL's legitimate interest in ensuring compliance with applicable laws, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.

Linking Third Party Accounts

You may link your GAPDL account with your account at a third party social networking service. When you create this link:

- i) the information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes; and
- ii) the publication and display of information that you provide to GAPDL through this linkage is subject to any of your settings and authorisations on the GAPDL website and the third party site.

We only collect your information from linked third party accounts to the extent necessary to ensure the adequate performance of our contract with you, or to ensure that we comply with applicable laws, or with your consent.

Google Maps/Earth

Parts of the GAPDL website use Google Maps/Earth services, including the Google Maps API(s). Use of Google Maps/Earth is subject to Google Maps/Earth Additional Terms of Use and the Google Privacy Policy. Third Party Partners & Integration

The GAPDL website may contain links to third party websites or services, such as third party integrations, co-branded services, or third party-branded services ("Third Party Partners"). GAPDL doesn't own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner. These Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

Your Choices

Managing Your Information

You may access, update, and correct most of your basic personal information by logging into your GAPDL account and reviewing your settings and profile. Where permitted by applicable law, you may request written copies of your personal information held by us. In some cases and where permitted by law, we may charge a fee which will be disclosed to you before we comply with your request. You are responsible for keeping your personal information up-to-date.

Data Retention & Account Cancellation

We generally retain your information for as long as is needed to provide the GAPDL website to you, or for as long as your account is active. If you no longer want us to use your information to provide the GAPDL website to you, you may cancel your account or request us to erase your personal information. To cancel your GAPDL account, contact us. If you cancel your account or request erasure of your personal information, note that:

- i) Information you have shared with others (such as Listing reviews) may continue to be publicly visible on the GAPDL website in association with your first name, even after your GAPDL account is cancelled.
- ii) Some copies of your information (e.g. log records) may remain in our database, but are disassociated from personal identifiers.
- iii) Because we maintain the GAPDL website to protect from accidental or malicious loss and destruction, residual copies of your information may not be removed from our backup systems for a limited period of time.
- iv) GAPDL may retain certain information to the extent necessary to comply with its legal obligations.
- v) GAPDL may retain certain information as necessary for its legitimate business interests, such as fraud detection and prevention, enhancing user safety, and defending itself against legal claims. For example, if GAPDL removes a user account for fraud or user safety reasons, GAPDL may retain certain information from that account to prevent that user from opening a new GAPDL account in the future.

Withdrawing Consent

In some jurisdictions, applicable law may entitle you to withdraw consent you previously gave to GAPDL to process your information and to end your use of the GAPDL website by cancelling your account as described in this section. Additionally, you may have the right to limit the ways in which we use your personal information. For information about, and to opt-out of, online behavioural advertising, please see our Cookie Policy.

Data Portability

In some jurisdictions, applicable law may entitle you to request a copy of your personal information that you have provided to us and/or to request us to move such personal information to another service provider. In such cases, and in line with our legal obligations, we will provide you or the service provider with information in a structured and commonly used format.

Restricting Processing

In certain extraordinary circumstances (e.g. where you think that GAPDL is not holding accurate data about you) and in line with applicable law, you may request GAPDL to temporarily restrict our use of your personal information for a limited period of time until the extraordinary circumstance that justified the restriction ends.

Objecting to Processing (including Automated Decision-Making)

In some jurisdictions, applicable law may entitle you to require GAPDL not to process your personal information for certain specific purposes, such as profiling or marketing purposes.

Exercising Rights and Lodging Complaints

If you would like to learn more about, or exercise any of, the rights described in this Privacy Policy contact us at gapdl@gapdl.com.au. We may ask you to verify your identity before taking further action on your request. You have the right to lodge complaints about the data processing activities carried out by GAPDL before competent data protection authorities.

Security

GAPDL utilizes a combination of industry-standard security technologies, procedures and organizational measures to help protect your personal information from unauthorized access, use or disclosure.

When you make a payment through our websites your personal and financial details are protected at all stages of the transaction by powerful encryption technology. Your credit card details are NOT stored on our servers at any stage of the transaction. Once the credit card details have been sent to our financial institution they are no longer known to our system. This ensures that your credit card details are seen only by yourself and the bank performing the transactions.

GAPDL's website contain links to other sites that are external. GAPDL takes care in linking websites but has no direct control over the content of the linked websites, or to the changes that may occur to the content on those sites. It is the responsibility of the user to make their own decisions about the accuracy, currency, reliability and correctness of information contained in linked external websites.

Cookie Policy

GAPDL tracks the patterns of its visitors across the gladstoneregion.info website using cookies. By using or accessing the GAPDL website (gladstoneregion.info), you are consenting to the GAPDL use of Cookies as outlined below.

What is a cookie?

Cookies are pieces of information that a website can transfer to an individual's computer hard drive for record keeping. The purpose of the cookie is to help the website keep track of your visits and activity.

Most Internet browsers are pre-set to accept cookies. If you prefer not to receive cookies, you can adjust your Internet browser to disable cookies or to warn you when cookies are being used.

How GAPDL uses cookies

Like many websites, GAPDL makes use of cookies for a variety of purposes to improve our visitor's online experience, for analytics and for marketing purposes.

We use cookies from third-party partners such as Google and Facebook for marketing and retargeting. These cookies allow us to display promotional material targeted towards you, on other websites you visit.

Emails

This is a website of GAPDL. E-mail correspondence sent to this site is subject to the Right to Information Act 2009 and will be treated as a public record and retained as required by the Public Records Act 2002 and other relevant Acts and regulations.

Your name and address details will not be added to a mailing list without your consent, nor will we disclose these details to third parties without your consent unless required by law. Email messages may be monitored by our website support staff for system trouble shooting and maintenance purposes.

Changes to this Privacy Policy

GAPDL reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the GAPDL website and update the "Last Updated" date at the bottom of this Privacy Policy. We will also provide you with notice of the modification by email at least thirty (30) days before the date they become effective. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your GAPDL account before the date the revised Privacy Policy becomes effective, your continued access or use of the GAPDL website will constitute acceptance of the revised Privacy Policy.

Contact

If you have any queries about our privacy and security practices please send an email to gapdl@gapdl.com.au If you wish to access or alter any personal information we may have collected about you, you may request such access by contacting our Privacy Officer at gapdl@gapdl.com.au.

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