

Belgravia Health & Leisure Group Pty Ltd

PRIVACY POLICY



Belgravia Health & Leisure Group Pty Ltd (comprising Belgravia Leisure and Genesis fitness clubs and related entities – together “Belgravia”, “we” or “us”) is committed to protecting your privacy and for that reason we will only collect, use, disclose, store and otherwise handle your personal and sensitive information in accordance with our privacy policy as stated below. We recognise that providing personal information is an act of trust which we take seriously. If you have any further queries, please contact our Privacy Officer via email at privacy@belgravialeisure.com.au.

1. Introduction and consent

Under the Privacy Act there are 13 Australian Privacy Principles ("APPs") which are rules that apply to both public and private sector organisations (including Belgravia) that regulate the way in which we deal with your personal information. Our privacy policy applies to your personal information regardless of the way in which we collect it. For example, whether it is collected via one of our websites, when you visit one of our venues, when you contact one of our customer service departments or visit one of our social media sites.

By submitting information to us and/or accessing and using our websites or social media platforms you consent to us using and disclosing your personal information in the ways described in this policy.

2. Information we collect

2.1 The type of personal information we collect includes:

- your name and contact details;
- age and date of birth;
- emergency contact details;
- bank account and/or credit card details, payment history (e.g. for invoicing and payments of services, products and membership or personal credit information when you make payments to us);
- student identification and employment details;
- health information – if you intend to use one of our venues or services where your health status may be a consideration;
- details regarding participation in our membership programs;
- details/history of preferences, interests and behaviour relating to transactions, products, services and activity with our digital services;
- your computer IP address when visiting our website;
- your image, if you are photographed at one of our venues;
- records of your communications and interactions with us, such as details of your previous dealings with us or any of the Belgravia managed facilities; and
- If you apply for a job in one of our businesses, details about your education, employment history, membership of professional associations, referees and next of kin.

Where we collect sensitive information from you (such as health information or details of memberships of professional associations) we will only do so with your consent. Such information will not be disclosed for any purpose other than providing services to patrons or members other than in exceptional cases such as to lessen a serious threat to a person's health or safety.

You are not obliged to provide personal information however failure to do so may result in Belgravia being unable to provide services or products to you.

2.2 Where you provide us with information about other people (e.g. recipients of gift vouchers) you must have their consent to do so. If we collect such personal information about an individual from you we will take all reasonable steps to ensure that the individual will or has been made aware of this privacy policy and:

- our identity and how to contact us;
- that he or she can access the information and the main consequences (if any) for the individual if all or part of the information is not provided by us;
- the purpose for which we have collected the information;
- the organisations or types of organisations that we usually disclose the information to;
- any law that requires particular information to be collected; and
- whether any personal information is likely to be disclosed overseas, and if practicable, notify the recipient countries.

3. How we collect information

3.1 Customer Information

We may collect personal information from you in a number of ways including:

- in any discussions we have with you, whether in person or by telephone;
 - through transactions you make with us and our centres (e.g. making a booking, using a membership card, participating in a promotion, competition, registering for a survey; or using a related digital service);
 - through our member application forms;
 - through customer feedback and survey forms;
 - through our website or email server by way of 'cookies'. Cookies are small pieces of data that allow the website to remember something about you at a later time, for example by storing information of how you use the site. You may configure the web browser to refuse or disable cookies;
 - through our social media pages that we control, such as the official pages for our various businesses on Facebook, Twitter and Instagram;
 - through our accounts and payments you make; and
 - through third parties, including companies running competitions on our behalf, our franchisees and our agents.
- #### **3.2 Facility and Franchisee Information**
- through the methods listed in points 3a (above) and;
 - through our agreements and documents relating to the application to become a Belgravia managed facility or Genesis franchise; and

If you do not wish for your personal information to be collected in a way anticipated by our Privacy Policy, we will use reasonable endeavours to accommodate your request. If we do comply with your request, or you provide us with inaccurate or incorrect information, we may not have sufficient information to conduct our business and we may be limited:

- in our ability to provide our services to customers;
- in our ability to manage our franchise/ contract relationships;
- in our ability to keep you informed of company updates and services information;
- in considering your application for employment with us; and
- in our ability to respond to your inquiry or request.

4. How we use your personal information

4.1 Customer Information

Your personal information may be used in a number of ways including:

- for the purpose requested;
- to assist you with queries or respond to your feedback;
- to process a booking or application that you have made;
- to conduct and administer swim, health club, golf or other memberships;
- to promote and market all current and future Belgravia businesses, venues, products and services and to inform you about the products and services of our commercial partners;
- to process and fulfil a gift voucher order;
- for surveys, direct marketing, promotions and competitions;
- to evaluate and improve the effectiveness of our website or social media;
- to compose diagnostic and statistical information for our computer network; and
- to facilitate our internal business operations, including the fulfilment of legal requirements and analysing our services and customer needs with a view to adopting new and/or improved services.

4.2 Franchisee Information

Franchisee's information may be used in a number of ways including:

- for the methods listed above in 4.1;
- to assess your suitability as a franchisee and/or contract partner, where you make an application to us; and
- for accounting purposes such as calculation and processing of franchise fees and royalties, billing of services, products and membership.

5. Direct Marketing

When you provide your personal details to us, you consent to us using your personal information for direct marketing purposes (for an indefinite period). Some personal information will be disclosed to an organisation or people who assist in our direct marketing, for example an external mail house.

From time to time, we may contact you with information about products and services offered by us and our related entities and our business partners, that we think may be of interest to you. When we contact you it may be by mail, telephone, email or SMS.

Where we use or disclose your personal information for the purpose of direct marketing, we will:

- allow you to 'opt out' – that is, allow you to request not to receive direct marketing communications; and
- comply with a request by you to so 'opt out' within a reasonable time frame.

We will only ever contact you if you have consented to direct marketing, and you can ask to be removed from our marketing lists at any time by directly contacting us.

We always provide supporters with an opportunity to opt-out of receiving future information via email. If you don't wish to receive new information, just email us at privacy@belgravialeisure.com.au or contact our Privacy Officer using the details at the end of this Privacy Policy.

6. The quality of your personal information

We believe it is important to make sure that the personal information we hold about you is accurate and up to date. To this end, our staff have procedures to monitor some of your personal information. However, the accuracy of the information we hold depends to a large extent on the information you provide. We request that you contact us and tell us if any of your personal information has changed (e.g. your address) or if you believe that the personal information is inaccurate. After you advise us, we can then update our records and ensure that the personal information we hold is accurate and up to date.

You may contact us and request particulars of the personal information we hold about you and whether that personal information needs to be amended or corrected in any way. You may email your request to privacy@belgravialeisure.com.au or contact our Privacy Officer using the details at the end of this Privacy Policy.

7. How we store and keep information secure

We are committed to maintaining the highest level of security of our client(s) files and personal information. We hold personal information electronically and in hard copy form, both at our premises and with the assistance of our service providers.

We use the following security measures to protect personal information:

- locked offices;
- locked files;
- passwords on all our computers;
- a firewall on our computer network, which is monitored; and
- virus protection software.

We will keep personal information as long as we need it for the purposes in clause 4.1 and 4.2 of this policy, after which time we will destroy or de-identify the personal information. Otherwise we may keep personal information for any period required by law.

While we strive to protect your personal and sensitive information, we cannot guarantee or warrant its complete security. No data over the internet can be guaranteed to be 100% secure. If you have an online account with one of our businesses, your account will be able to be accessed by anyone who knows your login details. You should keep login details, and any other information you use to remember these details, private and secure.

We will not be responsible for any loss or harm that you may suffer as a result of a leak of your personal information unless we have breached this privacy policy or the Australian privacy laws.

8. Disclosure of personal information

8.1 We may disclose personal information in a variety of circumstances including to:

- our contract partners, franchisees (to verify membership details, confirm a booking, gift voucher or prize and to provide you with services);
- a third-party contractor who may be performing services for us that involves your personal information such as our mail house in order to send you a membership card, advertising agencies, suppliers and our public relations agency;
- in the case of contract partner or franchisee information, this may be provided to third party suppliers in order to provide you with additional services (e.g. group purchase savings), contracted assessors for assessment of the quality control standards of our franchisees; and
- any other party to which the law obliges us to.

8.2 We may exchange your personal information with service providers engaged to assist with services including data processing, data analysis, online computing, printing, contract management, legal, accounting, business consulting, marketing, research, auditing, delivery, security and mailing services.

- 8.3 Third parties to whom we disclose personal information to may be located in America.
- 8.4 We will take reasonable steps to ensure that overseas recipients do not breach the APPs in relation to your personal information, such as by seeking compliance with the APPs in our terms of engagement with those parties. In the event that personal information must be disclosed overseas other than as described above, we will endeavour to obtain consent from you.
- 8.5 Please contact us if you do not wish for your personal information to be disclosed overseas. If you do not contact us to make this request, and an overseas recipient of your personal information breaches the APPs, we will not be accountable under the Act and you will not be able to seek redress under the Act.
- 8.6 We will not sell your personal information to marketing bodies without your consent.
- 9. Privacy queries, complaints and further information**
- 9.1 If you have any concerns, queries, disputes or complaints about our privacy policy or our privacy practices, please contact Belgravia's Privacy Officer on:
Phone: +61 3 8727 7777
Email: privacy@belgravialeisure.com.au
Post: 20 Longstaff Road, Bayswater VIC
- 9.2 If you have any disputes or complaints about the way in which your privacy has been handled by Belgravia please email us at privacy@belgravialeisure.com.au. Our privacy officer will investigate any dispute or complaint and respond to you within a reasonable time. If, after receiving our response you still consider that your privacy complaint has not been resolved you may then take your complaint to the Office of the Australian Information Commissioner (www.oaic.com.au) and on 1300 363 992.
- 9.3 This privacy policy may be amended or updated to ensure that we maintain the highest standards.
- 9.4 Some Genesis fitness clubs are owned and operated by franchisees which are independent entities that are responsible for their own privacy policies. For their privacy policies, please contact them directly.

This privacy policy was updated on 17 MAY 2016.