

Privacy Policy

Tourism Portfolio Group Pty Ltd (ACN 656
627 904) trading as Exclusive Use

Effective date: 05 June 2026

Last updated:05 June 2026

Privacy Policy - Exclusive Use

Tourism Portfolio Group Pty Ltd (ACN 656 627 904) trading as Exclusive Use

Address: 8/9 Myrtle Street, North Sydney NSW 2060, Australia

Email: hello@exclusiveuse.com.au (**Subject: "Privacy"**)

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1. GENERAL PURPOSE AND SCOPE

- 1.1 This Privacy Policy explains how Exclusive Use collects, holds, uses and discloses Personal Information and how you can access or correct your Personal Information or make a complaint.
- 1.2 This policy applies to Personal Information that we collect through:
 - a. our website - www.exclusiveuseaustralia.com.au;
 - b. our products and services;
 - c. communications with you (including email, phone, meetings, social media); and
 - d. our premises (including CCTV, where used).
- 1.3 This policy should be read together with our *Terms and Conditions*.

2. DEFINITIONS

Personal Information means information or an opinion about an identified individual, or an individual who is reasonable identifiable, whether true or not and whether recorded in material form or not.

Sensitive Information includes information such as health information, racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal record, or biometric information. We collect sensitive information consented to, or permitted by law, and where reasonably necessary for our functions or activities, unless an exception applies.

Privacy Incident/Data Breach means an actual or suspected unauthorised access to, disclosure of, or loss of Personal Information, including where such event is likely to result in serious harm where applicable under law.

3. PERSONAL INFORMATION COLLECTED

3.1 Personal Information we may collect include:

- a. name;
- b. residential or postal address;
- c. email address;
- d. telephone number;
- e. date of birth;
- f. job title and employer details;
- g. payment and billing information;
- h. records of communications with us;
- i. information you provide in enquiries, forms, application or contracts;
- j. website usage information (including IP address, browser type, pages visited, session data and device identifiers);
- k. identification information (e.g. driver licence or passport details) where necessary for a specific purpose;
- l. CCTV footage collected at our premises, where in operation;
- m. any other Personal Information reasonably necessary for our business activities.

3.2 If you choose not to provide requested Personal Information, we may be unable to provide services, respond to enquiries, enter into or perform a contract, process payments, or otherwise deal with you effectively.

4. HOW WE COLLECT PERSONAL INFORMATION

4.1 We generally collect Personal Information directly from you, including when you:

- a. use our website;
- b. complete our forms;
- c. correspond with us by email, phone, social media or in person; or
- d. engage our services.

4.2 We may also collect Personal Information from third parties where it is unreasonable or impracticable to collect it directly from you, and where lawful, such as from:

- a. our members or affiliated organisations;
- b. event organisers (e.g. trade shows); or
- c. service providers assisting us.

4.3 Where required by law, we will take reasonable steps to notify you of the collection and relevant matters.

5. WHY WE COLLECT PERSONAL INFORMATION

5.1 We collect, hold, use and disclose Personal Information for purposes including:

- a. processing applications or requests you make;
- b. providing services to you and enabling you to interact with member listings;
- c. communicating with you about our services, including service updates and administrative messages;
- d. providing information about our products or services;
- e. direct marketing;
- f. internal operations and business management, including quality assurance, analytics and system administration;
- g. maintaining and updating our business infrastructure;
- h. managing legal and regulatory compliance and risk; and
- i. any other purpose permitted or required by law.

5.2 We may disclose Personal Information for a secondary purpose if:

- a. you consent; or
- b. you would reasonably expect the use or disclosure and it is related to the primary purpose (or, for sensitive information, directly related); or
- c. the use or disclosure is otherwise authorised, permitted or required by law.

6. WHO WE DISCLOSE PERSONAL INFORMATION TO

6.1 We may disclose Personal Information to third parties where necessary for the purposes in section 5, including:

- a. IT, hosting, cloud, data storage, analytics and security providers;
- b. payment processors, where applicable;
- c. professional advisers, including legal, accounting, audit and insurance;
- d. contractors and outsourced service providers who assist our operations; and
- e. regulators, courts, tribunals and law enforcement where required or authorised by law.

6.2 We take reasonable steps to require third-party service providers to handle Personal Information securely and in accordance with applicable privacy obligations and understand that

third parties may have their own privacy practices.

7. COOKIES, ANALYTICS AND ONLINE ACTIVITY DATA

- 7.1 We may use cookies and similar technologies to operate our website, improve functionality, remember preferences and understand how visitors use our site.
- 7.2 Cookies may collect or generate information such as device identifiers, IP address, browser type, pages visited and session information. This information may be used for analytics, security and service improvement.
- 7.3 You may, at your discretion, configure your browser to refuse cookies or alert you when cookies are being used. If you disable cookies, some site features may not function properly.
- 7.4 We may retain server logs and security records for as long as reasonably necessary for security, troubleshooting, compliance and operational purposes, and then delete or de-identify them where appropriate.

8. STORAGE, SECURITY AND RETENTION

- 8.1 We hold Personal Information in electronic and physical form, including databases, document management systems, email systems, cloud storage and paper files.
- 8.2 We take reasonable steps to protect Personal Information from misuse, interference and loss, and from unauthorised access, modification or disclosure. Measures may include:
- a. access controls and user authentication;
 - b. password protection and multi-factor authentication;
 - c. secure networks and encryption;
 - d. staff training and confidentiality obligations;
 - e. secure storage of physical files;
 - f. restricted access to premises; and
 - g. data backup, monitoring and incident response procedures.
- 8.3 We retain Personal Information only for as long as reasonably necessary to fulfil the purposes for which it was collected, or as required by law, including record-keeping obligations. When no longer required, we take reasonable steps to securely destroy or de-identify Personal Information.

9. DIRECT MARKETING AND COMMUNICATIONS

9.1 We may send you marketing communications about our products, services and member offerings where permitted by law.

9.2 You may opt out of marketing communications at any time by:

- a. using the unsubscribe function in the relevant message (where available); or
- b. contacting us.

9.3 Opting out of marketing will not affect essential service or administrative communications.

10. OVERSEAS DISCLOSURE

10.1 Some third-party service providers we use may be located outside Australia or may store/access Personal Information outside Australia.

10.2 Where we disclose Personal Information to overseas recipients, we will take reasonable steps to ensure the disclosure is handled in accordance with applicable privacy requirements, including by taking steps to ensure the recipient does not breach the Australian Privacy Principles in relation to the information, unless an exception applies.

11. CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION

11.1 If you do not provide personal information we request, we may be unable to:

- a. provide the services or goods requested;
- b. respond to enquiries;
- c. enter into or perform a contract;
- d. process a payment;
- e. consider an application; or
- f. otherwise deal with you effectively.

12. DATA BREACHES

12.1 If we suspect a data breach, we will investigate and take appropriate action. Where required under the Notifiable Data Breaches scheme in the **Privacy Act 1988 (Cth)**, we will notify affected individuals and the Office of the Australian Information Commissioner.

13. ACCESS, CORRECTION AND COMPLAINTS

13.1 You may request access to, or correction of, Personal Information we hold about you. We will respond within a reasonable period and may need to verify your identity. We may charge a reasonable fee for providing access, where permitted by law (we will advise you in advance).

13.2 If you have a complaint about how we handle Personal Information, contact us at donna@exclusiveuse.com.au (Subject: "Privacy") and provide sufficient details so we can investigate.

13.3 Upon receiving a complaint, we will:

- a. acknowledge receipt of your complaint within a reasonable time; and
- b. investigate and respond in writing with the outcome (and reasons) within a reasonable time.

13.4 If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC) via www.oaic.gov.au.

14. LINKS TO OTHER WEBSITES

14.1 Our website may include links to third-party websites. We are not responsible for the privacy practices of third parties and encourage you to review their privacy policies before providing Personal Information.

15. CHANGES TO PRIVACY POLICY

15.1 We may update this Privacy Policy from time to time. The updated version will be published on our website with a revised "*Last updated*" date. Where required by law, we will provide notice of material changes by appropriate means

16. CONTACT US

- 16.1 For Privacy enquiries, access/correction requests, and complaints:
- a. **Email:** hello@exclusiveuse.com.au (Subject: "Privacy")
 - b. **Postal address:** 8/9 Myrtle Street, North Sydney NSW 2060, Australia

1. RELEVANT LEGISLATION

- 1.1 The following legislative provisions are relevant to this Privacy Policy:
- a. *Privacy Act 1988* (Cth);
 - b. *Privacy Legislation Amendment (Enforcement and Other Measures) Act 2022* (Cth);
 - c. *Privacy and Other Legislation Amendment Act 2024* (Cth)
 - d. *Privacy and Personal Information Protection Act 1998* (NSW);
 - e. *Spam Act 2003* (Cth);
 - f. *Do Not Call Register Act 2006* (Cth);
 - g. *Telecommunications Act 1997* (Cth)
 - h. *Telecommunications (Interception and Access) Act 1979* (Cth)
 - i. *Competition and Consumer Act 2010* (Cth); and
 - j. *Privacy and Data Protection Act 2014* (Vic).