



BLUEWATER BAR AND GRILL PRIVACY POLICY

Effective June 2026

This document is the Privacy Policy of Bluewater Hotel Pty Ltd ACN 166 736 134 as trustee for the BH Trust A.B.N 12 735 336 725 trading as Bluewater Bar and Grill ("**Bluewater Bar and Grill**"), also referred to as "we", "our", or "us" in this Privacy Policy.

This Privacy Policy relates to the collection and use of personal information that may be collected by or supplied to the Bluewater Bar and Grill. This Privacy Policy is in addition to any other terms and conditions applicable to the Bluewater Bar and Grill. The Bluewater Bar and Grill reserves the right to modify or amend this Privacy Policy at any time, in our absolute discretion.

The Bluewater Bar and Grill may collect information from users of its website; members of the Captains Club Membership Program and any other reward or membership programs operated by the Bluewater Bar and Grill ("Membership Programs"); users of any application, digital membership platform or portal utilised in connection with a Membership Programs; users of the MyCash system operated by Bluewater Bar and Grill for venue-based cashless gaming and payment transactions ("MyCash System"); and individuals attending the premises of the Bluewater Bar and Grill located at 7 Harbour Drive, Trinity Park, Queensland (the Venue).

Some information collected is information that may be capable of identifying an individual ("personal information"). This Privacy Policy, and the Australian Privacy Principles, regulates the way in which the Bluewater Bar and Grill will deal with such personal information.

Personal Information

1. Personal information is collected only when knowingly and voluntarily submitted. Personal information may be collected from members of any Membership Program operated by the Bluewater Bar and Grill, users of the MyCash System, attendees at the Venue, and individuals who use Bluewater Bar and Grill's applications, services, websites or social media platforms. Personal information may also be collected when you contact the Bluewater Bar and Grill to make an enquiry, request information, provide feedback, participate in promotions or otherwise interact with us.
2. The provision of certain personal information may be necessary for you to access or

participate in Membership Programs, use the MyCash System, utilise our applications or websites, or receive other products and services offered by the Bluewater Bar and Grill. If you choose not to provide requested information, we may be unable to provide some or all of those products or services to you.

3. Personal information may also be collected through third parties where you elect to access products or services provided by those third parties in connection with the Bluewater Bar and Grill's operations. In addition, information may be collected through your use of the Membership Programs, the MyCash System, and Bluewater Bar and Grill's applications and websites. To the extent that personal information is collected and managed directly by a third-party provider, that information will be handled in accordance with the applicable third party's privacy policy and terms of use.
4. Where personal information about a third party is provided (for example an employee, customer or supplier), you are responsible for ensuring that you have all necessary consent for such information to be provided to the Bluewater Bar and Grill.

Use of Information

5. Personal information that is provided to the Bluewater Bar and Grill will be used only for the primary purpose for which it is collected or for such other secondary purposes that are related to the primary purpose, unless the Bluewater Bar and Grill discloses other uses in this Privacy Policy or at the time of collection.
6. The Bluewater Bar and Grill may also use or disclose personal information for other purposes where you have provided your consent or where such use or disclosure is authorised under this Privacy Policy or applicable legislation.
7. Personal information collected by Bluewater Bar and Grill may be used to:
 - a. establish, administer and maintain your membership of any Membership Program operated by the Bluewater Bar and Grill;
 - b. register, administer and facilitate your use of any application, digital platform, website or other services offered by the Bluewater Bar and Grill;
 - c. establish and manage the MyCash System;
 - d. comply with the Bluewater Bar and Grill's legal and regulatory obligations, including obligations relating to anti-money laundering and counter-terrorism financing requirements, responsible gambling initiatives, gaming regulation and record-keeping obligations;
 - e. process transactions, issue invoices, collect payments and administer credits,

rewards, benefits and account balances;

- f. communicate with you regarding your memberships, accounts, transactions, enquiries, bookings, promotions, events and other products or services offered by the Bluewater Bar and Grill;
- g. provide customer assistance, technical support and respond to enquiries, feedback, requests and complaints;
- h. undertake identity verification, fraud prevention activities, security monitoring and investigations relating to suspected unlawful, fraudulent or unauthorised activity;
- i. market and promote products, services, events, offers and promotions offered by the Bluewater Bar and Grill and, where permitted by law, by its business partners and service providers; and
- j. undertake internal administration, business planning, reporting, analytics, research and quality assurance activities to improve Bluewater Bar and Grill's products, services, systems and customer experience.

8. The Bluewater Bar and Grill may also use the information to collate user data enabling it to improve its products and services.

Collecting information

9. We collect personal information about you so that you may take full advantage of the products and services offered by the Bluewater Bar and Grill. To facilitate the provision of those products and services, it may be necessary for you to provide additional personal information to us from time to time.

10. Personal information may be collected when you use any application operated by Bluewater Bar and Grill, register for any Membership Program, register for or use the MyCash system, attend the Venue, use our website or otherwise input, upload or provide information in order to access or utilise the products and services offered by the Bluewater Bar and Grill.

11. If you provide the Bluewater Bar and Grill with personal information about another person, you are responsible for ensuring that you have obtained all necessary consents and authorisations to disclose that information to the Bluewater Bar and Grill and that the relevant individual has been informed that their personal information will be handled in accordance with this Privacy Policy.

12. The Bluewater Bar and Grill may also collect, hold and use personal information relating to the registration and operation of the MyCash System, including information required for account registration and identity verification, records of gaming activity, transaction history, account balances, responsible gambling interactions, and information collected to enable the Bluewater Bar and Grill to comply with its obligations under applicable anti-money laundering and counter-

terrorism financing laws and regulations.

Disclosure

13. There may be circumstances where the Bluewater Bar and Grill is permitted or required to use or disclose personal information. This may include your name, phone number, date of birth, address and/or email address. Such disclosure may include circumstances where:-
 - a. Disclosure to a law enforcement agency is required for purposes relating to investigation or enforcement of criminal and other the Bluewater Bar and Grill;
 - b. Use or disclosures in accordance with an order made by a Court, a subpoena or otherwise authorised or compelled by law;
 - c. Use or disclosure is reasonably necessary to lessen or prevent a serious threat to the life, health or safety of an individual, or to public health or safety;
 - d. It is necessary to assist in investigations into suspected fraud or criminal activities;
 - e. Use or disclosure is necessary to assist in the recovery of lost, stolen or misappropriated property or equipment;
 - f. Use or disclosure is to service providers, contractors, advisers and third-party suppliers who assist the Bluewater Bar and Grill in operating its business and providing its products and services, including providers of Membership Programs, digital platforms and applications, payment processing services, information technology and cloud services, customer support services, marketing services and data hosting services;
 - g. Use or disclosure is necessary in connection with the operation of the MyCash System, including but not limited to disclosures required to verify identity, facilitate transactions, administer accounts, investigate suspicious activity, comply with responsible gambling obligations, or satisfy anti-money laundering and counter-terrorism financing requirements;
 - h. Use or disclosure is to Bluewater Bar and Grill's professional advisers, including legal advisers, accountants, auditors and insurers, where reasonably necessary for the conduct of its business; and
 - i. You have otherwise consented to the disclosure.
14. We may also disclose your personal information to other suppliers for the purposes of providing services to you or in order to facilitate the resolution of a dispute.
15. We may engage third parties to provide you with goods or services on our behalf. In that circumstance, we may disclose your personal information to those third parties in order to meet your request for goods or services.
16. In some instances, your personal information may be disclosed to our service providers

overseas.

17. If we sell, transfer or assign our business, your information may be disclosed to any prospective purchaser as part of that transaction.

Data Retention

18. The Bluewater Bar and Grill will retain personal information only for as long as is reasonably necessary to fulfil the purposes for which it was collected, including for operational, administrative, legal, regulatory, gaming, taxation, anti-money laundering and counter-terrorism financing, and dispute resolution purposes, or for such longer period as may be required or permitted by law. When personal information is no longer required, the Bluewater Bar and Grill will take reasonable steps to securely destroy or de-identify that information in accordance with applicable legal requirements.

Membership Program Data

19. The Bluewater Bar and Grill may collect, hold and use information relating to participation in any Membership Program and any other loyalty or rewards programs operated by Bluewater Bar and Grill. This information may include membership details, points balances, status credits, membership tier, offer and promotion redemption history, rewards claimed, participation in promotions and events, and other information reasonably necessary to administer and operate those programs, provide benefits and rewards, communicate relevant offers and improve the products and services offered to members.

Marketing

20. By registering with the Bluewater Bar and Grill, you consent to the Bluewater Bar and Grill sending marketing, product, and related communications and acknowledge that it may, in some circumstances, amount to 'commercial electronic messages' for the purposes of the *Spam Act 2003* (Cth). You may withdraw or unsubscribe from these messages at any time by emailing us.

Security

21. The Bluewater Bar and Grill will endeavour to take all reasonable steps to protect the personal information you may transmit to it. Once received, the Bluewater Bar and Grill will use best endeavours to ensure its security on and in its systems.
22. The Bluewater Bar and Grill may hold your personal information in a number of ways, including on our system or database but it may also involve storing data on storage or systems managed by third parties which may include the storage of data overseas.

App Analytics

23. The Bluewater Bar and Grill may collect and analyse information relating to your use of its applications and digital platforms for the purposes of administering and improving any Membership Program, enhancing member engagement and optimising the user experience. Such information may include details of application usage, device and browser information, operating system information, location data where location services have been enabled on your device, login and authentication activity, interactions with offers and promotions, QR code scans, feature usage and engagement metrics, preferences, and other technical information generated through your use of the application.
24. The information collected through app analytics may be used to monitor and improve the performance, functionality and security of the application, personalise content and offers, troubleshoot technical issues, better understand how members interact with the application, and inform the development of new features, products and services.

Collecting Information from Users

25. *IP Addresses*

The web servers gather your IP address to assist us to measure or improve our website and to assist with the diagnosis of problems or support issues with our services.

26. *Cookies and Applets*

The Bluewater Bar and Grill may use cookies to provide you with a better experience. This aggregate, non-personal information is collated and provided to us to assist in analysing the usage of the website, application or any digital platforms of the Bluewater Bar and Grill.

Access to Information (and right to correct)

27. The Bluewater Bar and Grill will endeavour to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate and up to date. If, at any time, you discover that information held about you is incorrect, you may contact us to have the information corrected.

Links to other sites

28. Where the Bluewater Bar and Grill provide links to third party websites and products these linked sites are not under the Bluewater Bar and Grill's control, and it cannot accept responsibility for the conduct of companies linked to our website.

29. Before disclosing your personal information on any other website, you must examine the terms and conditions of using that website and its privacy statement.

Problems, questions or complaints

30. If you have any queries relating to our Privacy Policy, or you have a problem or complaint, please contact us at info@thebluewater.com.au.

31. For more information about privacy issues in Australia and protecting your privacy, visit the website of the Office of the Australian Information Commissioner: <https://www.oaic.gov.au/privacy>.