

# Privacy Policy

## Siomas Management Pty Ltd

### 1. Introduction

Siomas Management Pty Ltd ABN 676187509 ("we", "us", "our") is committed to protecting your privacy and handling your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This Privacy Policy explains how we collect, use, disclose, and protect your personal information when you use our short-stay accommodation services, visit our website, or interact with us.

#### Contact Details:

**Business Name:** Siomas Management Pty Ltd

**ABN:** 676187509

**Email:** siomasmanagement@gmail.com

**Phone:** +61418936564

### 2. What Personal Information We Collect

We may collect the following types of personal information:

#### 2.1 Information You Provide Directly

- **Contact details:** Name, email address, phone number, postal address
- **Booking information:** Check-in/check-out dates, number of guests, special requests
- **Payment information:** Credit/debit card details (processed securely through Stripe - we do not store complete card numbers)
- **Identification:** Government-issued ID (if required for verification purposes)
- **Emergency contact details:** If provided
- **Communication records:** Correspondence with us via email, phone, or other channels

#### 2.2 Information Collected Automatically

When you visit our website, we may automatically collect:

- **Technical information:** IP address, browser type and version, device type, operating system
- **Usage data:** Pages visited, time spent on pages, links clicked, referring website
- **Cookies and similar technologies:** See Section 8 for details

#### 2.3 Information from Third Parties

We may receive information about you from:

- **Payment processors:** Transaction details from Stripe
- **Booking platforms:** If you book through third-party platforms

- **Identity verification services:** If used for security purposes

### 3. How We Collect Personal Information

We collect personal information through:

- Our website booking forms and account registration
- Email, phone, or written correspondence
- Payment processing systems
- Our property management systems
- In-person interactions at check-in or during your stay
- Third-party booking platforms and service providers
- Cookies and tracking technologies on our website

### 4. Why We Collect and Use Your Personal Information

We collect and use your personal information for the following purposes:

#### 4.1 Primary Purposes

- **Processing bookings:** Managing reservations, sending confirmations, and providing access to properties
- **Payment processing:** Collecting payment, processing refunds, managing bonds
- **Service delivery:** Providing accommodation services and responding to your requests
- **Communication:** Sending booking confirmations, check-in instructions, and responding to enquiries
- **Customer support:** Addressing issues, complaints, and providing assistance during your stay

#### 4.2 Secondary Purposes

- **Marketing:** Sending promotional offers, newsletters, and updates about our services (with your consent)
- **Business improvement:** Analyzing usage patterns, gathering feedback, and improving our services
- **Legal compliance:** Meeting our legal obligations, including taxation and business reporting
- **Security:** Preventing fraud, protecting our properties, and ensuring guest safety
- **Dispute resolution:** Managing complaints, disputes, and legal claims

#### 4.3 Legal Basis

We process your personal information based on:

- **Contract performance:** Necessary to provide accommodation services
- **Consent:** Where you have given explicit consent (e.g., marketing communications)
- **Legal obligations:** Required by Australian law
- **Legitimate interests:** For business operations, security, and improvement of services

## 5. Who We Share Your Information With

We may disclose your personal information to:

### 5.1 Service Providers

- **Payment processors:** We use only secure payment processors
- **Booking management systems:** For booking and reservation management
- **Communication services:** Email and SMS providers for sending booking confirmations and marketing materials
- **Cloud storage providers:** For secure data storage and backup
- **Website hosting providers:** For website operation and maintenance
- **Cleaning and maintenance contractors:** Only information necessary for service delivery

### 5.2 Legal and Regulatory Bodies

- Law enforcement agencies when required by law
- Government agencies for tax and regulatory compliance
- Courts and tribunals in connection with legal proceedings

### 5.3 Business Transactions

- Potential buyers or investors in the event of a business sale or merger (with appropriate confidentiality measures)

### 5.4 Third-Party Platforms

- Booking platforms where you made your reservation (e.g., Airbnb, Booking.com) for booking management and reviews

We do not sell, rent, or trade your personal information to third parties for their marketing purposes.

All third parties we work with are required to handle your information securely and in accordance with applicable privacy laws.

## 6. Overseas Disclosure

Some of our service providers may store or process data outside Australia.

When we disclose personal information overseas, we take reasonable steps to ensure the recipient complies with the Australian Privacy Principles or is subject to similar privacy protections.

## 7. Data Security

We take the security of your personal information seriously and implement appropriate technical and organisational measures:

## 7.1 Security Measures

- **Encryption:** All payment information is transmitted using SSL/TLS encryption (HTTPS)
- **Secure payment processing:** PCI-DSS compliant payment processing through Stripe
- **Access controls:** Limited access to personal information on a need-to-know basis
- **Password & 2FA protection:** Secure password requirements for account access
- **Regular security updates:** Systems are regularly updated and patched
- **Staff training:** Employees are trained on privacy and data security obligations

## 7.2 Data Breach Response

In the event of a data breach that is likely to result in serious harm, we will:

- Notify affected individuals as soon as practicable
- Notify the Office of the Australian Information Commissioner (OAIC)
- Take immediate steps to contain and remediate the breach

## 8. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to:

- Remember your preferences and settings
- Analyze website traffic and user behavior
- Improve website functionality and user experience
- Enable certain features like booking forms

### 8.1 Types of Cookies We Use

- **Essential cookies:** Required for website functionality
- **Analytics cookies:** Help us understand how visitors use our site
- **Functional cookies:** Remember your preferences
- **Marketing cookies:** Track your activity for advertising purposes (only with consent)

You can control cookies through your browser settings. Disabling certain cookies may affect website functionality.

## 9. Marketing Communications

### 9.1 Consent

We will only send marketing communications (promotional offers, newsletters, updates) if you have:

- Opted in to receive them, or
- Previously engaged with our services and have not opted out

### 9.2 Opting Out

You can opt out of marketing communications at any time by:

- Clicking the "unsubscribe" link in any marketing email
- Contacting us at [siomasmanagement@gmail.com](mailto:siomasmanagement@gmail.com)
- Updating your preferences in your account settings

Even if you opt out of marketing, we will still send essential communications related to your bookings.

## **10. Your Privacy Rights**

Under the Privacy Act 1988 (Cth), you have the following rights:

### **10.1 Access**

You have the right to request access to the personal information we hold about you. We will provide this within 30 days of your request.

### **10.2 Correction**

You can request correction of inaccurate, incomplete, or out-of-date personal information. We will take reasonable steps to correct the information within 30 days.

### **10.3 Deletion**

You may request deletion of your personal information, subject to:

- Our legal obligations to retain certain records
- Ongoing contractual relationships
- Legitimate business purposes

### **10.4 Complaints**

If you believe we have breached your privacy, you can lodge a complaint with us. We will:

- Acknowledge your complaint within 7 days
- Investigate the matter
- Respond within 30 days with our findings and proposed resolution

### **10.5 How to Exercise Your Rights**

To exercise any of these rights, contact us at:

- **Email:** [siomasmanagement@gmail.com](mailto:siomasmanagement@gmail.com)
- **Phone:** 0418936564

We may require proof of identity before processing your request.

### **10.6 OAIC Complaint**

If you are not satisfied with our response, you can lodge a complaint with the Office of the Australian Information Commissioner:

- **Website:** [www.oaic.gov.au](http://www.oaic.gov.au)
- **Phone:** 1300 363 992
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 11. Data Retention

We retain your personal information for as long as necessary to:

- Fulfill the purposes described in this Privacy Policy
- Comply with legal obligations (e.g., tax records retained for 7 years)
- Resolve disputes and enforce our agreements

### 11.1 Retention Periods

- **Booking information:** 7 years (for tax and business records)
- **Payment records:** 7 years (for financial compliance)
- **Communication records:** 3 years or until matter resolved
- **Marketing preferences:** Until you unsubscribe or request deletion
- **Website analytics:** Typically 26 months

After the retention period, we will securely delete or anonymize your personal information.

## 12. Children's Privacy

Our services are not directed to children under 18 years of age. We do not knowingly collect personal information from children. If you are a parent or guardian and believe your child has provided us with personal information, please contact us immediately.

## 13. Third-Party Websites

Our website may contain links to third-party websites (e.g., social media platforms, review sites, booking platforms). This Privacy Policy does not apply to those sites. We encourage you to review the privacy policies of any third-party sites you visit.

We are not responsible for the privacy practices or content of third-party websites.

## 14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors.

When we make changes:

- We will update the "Last Updated" date at the top of this policy
- For material changes, we will notify you via email or prominent notice on our website
- Continued use of our services after changes constitutes acceptance of the updated policy

We encourage you to review this Privacy Policy periodically.

## 15. Contact Us

If you have any questions, concerns, or complaints about this Privacy Policy or how we handle your personal information, please contact us:

**Contact Details:**

**Business Name:** Siomas Management Pty Ltd

**ABN:** 676187509

**Email:** siomasmanagement@gmail.com

**Phone:** +61418936564

We aim to respond to all enquiries within 7 business days.

## 16. Consent and Acknowledgment

By using our services, visiting our website, or providing us with your personal information, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and disclosure of your personal information as described herein.

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