



## **PRIVACY POLICY**

*Updated December 1, 2019*

### **WHO WE ARE**

This Privacy Policy applies to all of the products, services and websites offered by Nautilus Resort or its subsidiaries or affiliated companies. Sometimes, we may post product specific privacy notices or materials to explain our services and products in more detail. If you have any questions about this Privacy Policy, please feel free to contact us through our website. Our website address is:  
<http://www.nautilusresortrarotonga.com>

### **WHAT PERSONAL DATA WE COLLECT AND WHY WE COLLECT IT**

#### **COMMENTS**

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

#### **MEDIA**

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

#### **CONTACT FORMS COOKIES**

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.



## **USER COMMUNICATION**

When you send an email or other communications to Nautilus Resort, we may retain those communications in order to process your inquiries, respond to your requests and improve our services. When you send and receive SMS messages to or from one of our services that provides SMS functionality, we may collect and maintain information associated with those messages, such as the phone number, the wireless carrier associated with the phone number, the content of the message, and the date and time of the transaction. We may use your email address to communicate with you about our services or products but never to send you communications that are not related to your purchases or that you haven't opted into.

## **TRAFFIC COMMUNICATION**

When you access the services of Nautilus Resort via browser, application or other clients we record certain information using our traffic analysis tool, Google Analytics. This information is stored in an anonymised manner but does include data such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account. These logs are retained for a period of 12 months and are used for content and marketing planning purposes so that we can improve our content and services. After this time, these logs are automatically deleted.

## **EMBEDDED CONTENT FROM OTHER WEBSITES**

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

In addition to the above, we may use the information we collect to:

- Provide, maintain, protect, and improve our services (including advertising services) and develop new services; and
- Protect the rights or property of Nautilus Resort or our users.



If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

Nautilus Resort processes personal information on our servers in Australia. In some cases, we process personal information outside your own country.

### **WHO WE SHARE YOUR DATA WITH**

Nautilus Resort only shares personal information with other companies or individuals outside of Nautilus Resort in the following limited circumstances:

We have your consent. We require opt-in consent for the sharing of any sensitive personal information.

If we provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of Nautilus Resort, its users or the public as required or permitted by law.

If Nautilus Resort becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

### **HOW LONG WE RETAIN YOUR DATA**

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.



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For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

### **WHAT RIGHTS YOU HAVE OVER YOUR DATA**

When you use Nautilus Resort services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Because of the way we maintain certain services, after you delete your information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

### **WHERE WE SEND YOUR DATA**

Visitor comments may be checked through an automated spam detection service.

### **ADDITIONAL INFORMATION**

#### **HOW WE PROTECT YOUR DATA**

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to Nautilus Resort employees, contractors and agents who need to know that information in order to process it on our behalf. These individuals are bound by confidentiality obligations and may be subject to discipline, including



termination and criminal prosecution if they fail to meet these obligations.

### **WHAT THIRD PARTIES WE RECEIVE DATA FROM**

We may obtain personal information concerning you from third parties, including from: people making enquiries or bookings on your behalf, providers of any meetings or event services which are enquired about or booked with us, and people referencing you in posts on our social media channels. Examples of third parties are provided below. One of our online booking systems is provided by a third party. We collect the personal information you provide in respect of a booking made via this system, such as your name, email address and phone number. We may also obtain personal information from a third party, which provides a location-based customer intelligence platform which enables us to see what is happening on our social media pages, as well as at our venues when customers have enabled geolocation on their device and make a social media post while at our venues.

Our website may contain links to websites operated and maintained by third parties over which we have absolutely no control. These third-party websites are not subject to this Privacy Policy or our privacy standards and procedures. Any information you provide to third-party websites will be governed by the terms of the websites' privacy policies. We have no responsibility or liability whatsoever for the content, actions or policies of third-party websites. The inclusion of third-party links on our websites in no way constitutes an endorsement of such websites' content, actions or policies.

### **INDUSTRY REGULATORY DISCLOSURE REQUIREMENTS**

#### **PRIVACY LAWS**

We process your personal information in accordance with the following privacy law(s): the Australian Privacy Principles contained in the Privacy Act, 1988 which regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information. Our regulator is the Office of the Australian Information Commissioner (OAIC) (<http://www.oaic.gov.au/>).

#### **OTHER LAWS**

We also comply generally with the laws of Australia in relation to the processing of your personal information, and not any other laws.





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## **CHANGES TO THIS PRIVACY POLICY**

We may change this Privacy Policy at any time and from time to time without notice to you, including by publishing a new version on our websites. You should check this Privacy Policy for updates each time you visit our websites to be sure that you are aware of any changes. You should check the top of the document to see the latest version in force. Any change will be prospective only, and we will not make any changes that have retroactive effect unless legally required to do so.

## **CONTACTING US**

If you have any questions about our Privacy Policy or about how we process your personal information, please contact us either by e-mail to [res@nautilusresortrarotonga.com](mailto:res@nautilusresortrarotonga.com) telephone on **+682-25125** or,

**by post to:**  
PO BOX 50,  
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