



Privacy Policy

Operator: LoungeIQ (sole trader: Gordon Grieve)

Jurisdiction: Queensland, Australia

Contact: contact@loungeiq.com

Support: support@loungeiq.com

Document Control – Version History

<u>Version</u>	<u>Date</u>	<u>Author</u>	<u>Description of Changes</u>	<u>Approved By</u>
1.0	April 2026	Gordon Grieve	Initial policy developed	Gordon Grieve/Operator
1.1	April 2026	Nicholas Tompkins	Review and legislative updates	Gordon Grieve/Operator

1. Who we are

LoungeIQ is operated by Gordon Grieve ABN 57 517 907 315, a sole trader registered in Queensland, Australia. LoungeIQ provides an airport lounge discovery, review, and access platform at loungeiq.com and associated mobile applications.

- **Data controller:** Gordon Grieve
- **Contact:** contact@loungeiq.com
- **Website:** loungeiq.com
- **Registered address:** Queensland, Australia

2. Scope of this policy

This Privacy Policy applies to all personal information collected by LoungeIQ through the website loungeiq.com, any associated mobile applications, email communications, customer support interactions, and any other channels through which you interact with LoungeIQ.

This policy does not apply to third-party websites or services that we link to, including affiliate partner websites, credit card issuer websites, lounge operator websites, and payment processors. We encourage you to read the privacy policies of these third parties before providing them with your information.

Although LoungeIQ is currently under the AU\$3 million annual turnover threshold for the Privacy Act 1988 (Cth) small business exemption, we have voluntarily adopted this comprehensive privacy policy as best practice. We intend to comply with the Australian Privacy Principles (APPs) and relevant provisions of the General Data Protection Regulation (GDPR) for our EU/EEA visitors. The small business exemption is under active government review and is expected to be removed in upcoming reform tranches.

3. What information we collect

3.1 Information you provide directly

- **Account registration:** email address, display name, password (stored as a salted hash - we never store plaintext passwords)
- **Profile information:** credit cards held (card type and issuer only - we never collect card numbers, expiry dates, or CVVs), airline frequent flyer status and tier, lounge membership details (Priority Pass, DragonPass, LoungeKey, etc.)
- **User-generated content:** lounge reviews and ratings (1-5 scale across multiple categories), photos you upload, lounge corrections and submissions, comments
- **Communications:** messages sent via the contact form, emails to our support addresses, feedback and bug reports
- **Subscription information:** if you subscribe to LoungeIQ Pro, your billing is processed by Stripe. We receive confirmation of your subscription status but do not store your full payment card details
- **Survey responses:** if you participate in optional surveys or feedback requests

3.2 Information collected automatically

- **Usage data:** pages visited, features used (such as AccessIQ lookups, lounge comparisons, trip planner usage), time spent on pages, click patterns, search queries entered
- **Device information:** browser type and version, operating system, screen resolution, device type (mobile, tablet, desktop)

- **Network information:** IP address (used for approximate geolocation to suggest nearby airports - we do not use precise GPS unless you explicitly grant permission), internet service provider
- **Referral data:** the website or source that referred you to LoungeIQ (search engine, social media, direct link, email campaign)
- **Performance data:** page load times, errors encountered, technical diagnostics

3.3 Information from third parties

- **Authentication providers:** if you sign in using Google OAuth (planned), we receive your name, email address, and profile photo from Google
- **Analytics providers:** anonymised usage statistics from our analytics service
- We do not purchase or acquire personal information about you from data brokers or other third-party sources

4. How we use your information

4.1 To provide and improve the LoungeIQ service

- Display lounge access information based on your saved cards, status, and memberships via AccessIQ
- Show your reviews and ratings to other users
- Personalise your experience (e.g. showing relevant airports based on your location)
- Process and manage your LoungeIQ Pro subscription
- Provide customer support and respond to your enquiries

4.2 To analyse and improve the platform

- Understand how people use LoungeIQ to improve features and fix bugs
- Analyse aggregated, anonymised usage patterns to identify popular lounges, airports, and features
- Test new features and improvements

4.3 To communicate with you

- Respond to your support requests and enquiries
- Send service-related notifications (e.g. changes to your account, subscription renewals, security alerts)
- With your explicit consent, send marketing emails about new features, lounge deals, blog content, and travel tips. You can unsubscribe at any time

4.4 Legal and compliance

- Comply with applicable laws, regulations, and legal processes
- Respond to lawful requests from law enforcement or government authorities
- Protect the rights, safety, and property of LoungeIQ, our users, and the public
- Enforce our Terms of Use
- We may request proof of identity before processing access, correction or deletion requests.

4.5 Automated decision-making

We do not use your personal information for automated decision-making that could significantly affect your rights or interests. The AccessIQ tool provides factual information about lounge access eligibility based on rules you provide - it does not make decisions about you. If we introduce any form of automated decision-making in the future, we will update this policy and provide you with the right to request human review.

4.6 No sale of personal data

We do not sell personal information.

5. Legal basis for processing (GDPR - EU/EEA users)

For users in the European Economic Area, we process your personal information under the following legal bases:

- **Consent:** for marketing emails and optional cookies
- **Contract performance:** to provide the LoungeIQ service, manage your account, and process your Pro subscription
- **Legitimate interests:** to improve the platform, prevent fraud, and ensure security
- **Legal obligation:** to comply with applicable laws and regulations

6. How we share your information

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

We share information only in the following limited circumstances:

6.1 Service providers

We use the following third-party services to operate LoungeIQ. Each processes data on our behalf and is bound by their own privacy policies and data processing agreements:

- **Supabase** (supabase.com) - database hosting, authentication, and file storage. Data may be processed in the United States and European Union
- **Vercel** (vercel.com) - website hosting, deployment, and analytics. Data may be processed in the United States, European Union, and other regions
- **Stripe** (stripe.com) - payment processing for LoungeIQ Pro subscriptions. Stripe is PCI DSS Level 1 certified. Data is processed in accordance with Stripe's privacy policy
- **Cloudflare** (cloudflare.com) - DNS management, CDN, and security services. Data may be processed globally
- **Google** (google.com) - Google Places API for lounge photos and location data. Subject to Google's privacy policy

6.2 Public content

Reviews, ratings, and comments you post on LoungeIQ are visible to all users and may be indexed by search engines. Your display name is shown alongside your reviews. Do not include personal information in reviews that you do not want to be public. You can edit or delete your reviews at any time through your account.

6.3 Aggregated and anonymised data

We may share anonymised, aggregated data about lounge usage trends, popular airports, and general platform statistics with lounge operators, partners, and the public. This data cannot be used to identify individual users.

6.4 Affiliate partners

When you click an affiliate link on LoungeIQ, you are redirected to the affiliate partner's website. We may share a referral identifier (not your personal information) to track that the click originated from LoungeIQ. The affiliate partner's privacy policy governs their use of any information you provide to them.

6.5 Legal requirements

We may disclose your information if required by law, court order, subpoena, or government request, or if we believe in good faith that disclosure is necessary to protect the rights, safety, or property of LoungeIQ, our users, or the public.

6.6 Business transfers

If LoungeIQ is acquired, merged, or substantially all of its assets are transferred to another entity, your personal information may be transferred as part of that transaction. We will notify you of any such transfer and any changes to this privacy policy.

7. International data transfers

LoungeIQ is operated from Australia. Our service providers may process data in the United States, European Union, and other countries. By using LoungeIQ, you acknowledge that your information may be transferred to and processed in countries other than your own.

We take reasonable steps to ensure that overseas recipients handle your personal information in accordance with the Australian Privacy Principles and, where applicable, the GDPR. These steps include selecting reputable service providers with strong privacy practices and, where available, relying on adequacy decisions, standard contractual clauses, or other appropriate safeguards.

8. How we protect your information

We implement reasonable and appropriate security measures to protect your personal information, including:

- Encryption of all data in transit using HTTPS/TLS
- Encryption of sensitive data at rest in our database
- Row Level Security (RLS) policies in Supabase ensuring users can only access their own personal data
- Secure authentication through Supabase Auth with bcrypt-hashed passwords
- Regular rotation of API keys and credentials
- Environment variable management to prevent credential exposure
- Google Places API safeguards including rate limiting, caching, and circuit breaking to prevent excessive data requests
- Regular review of security practices and access controls
- Access to production systems limited to the platform operator (Gordon Grieve)
- Residual copies may remain temporarily in secure backups before automation deletion.

No system is completely secure. While we take reasonable precautions, we cannot guarantee the absolute security of your information. We encourage you to use a strong, unique password for your LoungeIQ account.

In the event of a data breach that is likely to result in serious harm to affected individuals, we will notify the affected users and the Office of the Australian Information Commissioner (OAIC) as soon as practicable, and in any case within 30 days of becoming aware of the breach. This aligns with the Notifiable Data Breaches (NDB) scheme under Part IIIC of the Privacy Act 1988, which we voluntarily comply with as best practice.

9. Cookies and tracking technologies

9.1 Essential cookies

Required for core site functionality including authentication, session management, and security. These cookies are necessary for LoungeIQ to operate and cannot be disabled. They do not store personally identifiable information beyond your session.

9.2 Analytics

We use Vercel Analytics to understand how people use LoungeIQ. Vercel Analytics collects anonymised, aggregate usage data without placing tracking cookies.

9.3 Affiliate tracking

When you click an affiliate link, the affiliate partner (such as Travelpayouts, Priority Pass, or other partners listed in our Affiliate Disclosure) may set a cookie on your device to track the referral. These cookies are set by the third-party partner, not by LoungeIQ, and are subject to the partner's privacy policy. We do not control these cookies.

9.4 Your cookie choices

Our cookie consent banner allows you to accept or decline non-essential cookies when you first visit LoungeIQ. You can change your preferences at any time through the cookie settings link in the site footer. You can also control cookies through your browser settings. Note that disabling essential cookies may prevent you from using some features of LoungeIQ.

We do not use fingerprinting, pixel tracking, or other covert tracking technologies. We do not participate in cross-site tracking or sell tracking data to advertisers.

10. Your rights

10.1 Rights for all users

- **Access:** You can request a copy of the personal information we hold about you by emailing contact@loungeiq.com. We will respond within 30 days
- **Correction:** You can update or correct your information through your account settings at any time, or by contacting us
- **Deletion:** You can request deletion of your account and associated personal information by emailing contact@loungeiq.com. We will action deletion requests within 30 days, except where we are required to retain information for legal obligations
- **Withdraw consent:** You can unsubscribe from marketing emails at any time using the unsubscribe link in each email. You can change your cookie preferences at any time

- **Data export:** You can request a copy of your data in a commonly used, machine-readable format (JSON or CSV)
- **Complaint:** If you believe we have mishandled your personal information, you can lodge a complaint with us at contact@loungeiq.com. We aim to respond to complaints within 14 business days. If you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner (OAIC) at oaic.gov.au or by phone on 1300 363 992

10.2 Additional rights for EU/EEA residents (GDPR)

- **Data portability:** receive your personal data in a structured, commonly used, machine-readable format
- **Right to restrict processing:** request that we limit how we use your data in certain circumstances
- **Right to object:** object to processing based on legitimate interests
- **Right to erasure:** request deletion of your personal data (subject to legal retention requirements)
- **Right to lodge a complaint** with your local Data Protection Authority

To exercise any of these rights, contact us at contact@loungeiq.com. We will respond within 30 days (or within the timeframe required by applicable law).

Under reforms commencing 10 June 2025, individuals in Australia have a new statutory tort (right to sue) for serious invasions of privacy. This includes intrusion upon seclusion and misuse of personal information. We take our privacy obligations seriously and aim to resolve any concerns before they reach that stage.

11. Data retention

We retain your personal information only for as long as necessary to fulfil the purposes described in this policy. Specific retention periods:

- **Account data** (email, display name, profile): retained while your account is active. Deleted within 30 days of account deletion request
- **Credit card and membership details** (for AccessIQ): retained while your account is active. Deleted immediately upon account deletion
- **Reviews and ratings:** may remain on the platform in anonymised form after account deletion, as they form part of the community resource. Your display name will be replaced with 'Former User'
- **Payment and subscription records:** retained for 7 years after the last transaction, as required by Australian tax law (Income Tax Assessment Act 1997)
- **Server logs:** retained for 90 days, then automatically deleted
- **Anonymised analytics data:** retained indefinitely (cannot be linked to individual users)
- **Support correspondence:** retained for 2 years after resolution, then deleted
- **Cookie consent preferences:** retained for 12 months, then re-prompted

12. Children's privacy

LoungeIQ is not intended for use by anyone under the age of 16. We do not knowingly collect personal information from children under 16. If we become aware that we have inadvertently collected personal information from a child under 16, we will take steps to delete that information as promptly as possible. If you believe a child under 16 has provided us with personal information, please contact us at contact@loungeiq.com.

13. Use of artificial intelligence

LoungeIQ uses artificial intelligence (AI) tools in the development and operation of the platform. Specifically: (a) AI tools (including Claude by Anthropic) were used to assist in the development of the LoungeIQ codebase, website content, blog posts, and these legal documents. All AI-generated content has been reviewed, edited, and approved by the LoungeIQ team before publication. (b) AI may be used to assist in processing and categorising lounge data, including access rules and amenity information. This data is verified against official sources. (c) AI is not used to make decisions about individual users, their accounts, or their access to features. (d) We do not use AI to generate or manipulate user reviews - all reviews are submitted by real users. This disclosure is provided proactively in anticipation of emerging AI transparency requirements, including the EU AI Act (Article 50, effective August 2026) and evolving Australian regulatory guidance.

14. Do Not Track

Some browsers send a 'Do Not Track' (DNT) signal to websites. As there is no universally accepted standard for how to respond to DNT signals, LoungeIQ does not currently respond to DNT signals. However, our privacy-focused analytics approach means we minimise tracking regardless of your DNT setting.

15. Changes to this policy

We may update this privacy policy from time to time to reflect changes in our practices, technology, or legal requirements. If we make significant changes, we will notify you by posting a prominent notice on LoungeIQ and, where possible, by sending you an email. The date at the top of this policy indicates when it was last updated. We encourage you to review this policy periodically.

16. Contact us

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

- **Email:** contact@loungeiq.com
- **Privacy enquiries:** contact@loungeiq.com
- **Business:** LoungeIQ, operated by Gordon Grieve ABN 57 517 907 315
- **Location:** Queensland, Australia
- **Complaints to the regulator:** Office of the Australian Information Commissioner, oaic.gov.au, 1300 363 992