

AUSTRALIA YINMORE WINES PTY LTD

PRIVACY POLICY

This privacy policy (the **Policy**) sets out in accordance with the *Privacy Act 1988* (Cth) the way in which Australia Yinmore Wines Pty Ltd and its associated entities and brands (together **Australia Yinmore Wines, We, Us, or Our**) may collect, store, use, manage and protect your Personal Information.

By:

- a. using this website;
- b. accessing, requesting, enquiring about, or purchasing Our products and services (either online or in person); or
- c. providing Personal Information to Australia Yinmore Wines, its officers, agents or employees

After this Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your Personal Information by Us in accordance with this Policy and the *Privacy Act*.

If you **do not** agree to Us handling your Personal Information in the manner set out in this Policy you must immediately cease to access this website or Our products and services, and you should not provide Us with any of your Personal Information.

1. What is Personal Information?

We follow the definition of Personal Information given in the *Privacy Act*:

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

2. What kinds of Personal Information might We collect and hold?

We may collect (and hold) different Personal Information from you depending upon how you interact with us. Generally, the types of personal information we collect (and hold) may include your name, contact details including address, e-mail address and phone number.

If you access Our website, We may collect information about how you have used Our site.

We may also collect information about:

- a. your demographic;
- b. your interests;
- c. your marital status and anniversary;
- d. your date of birth;
- e. your purchases of products and services related to Our activities;
- f. your location;
- g. the technology you use to access our services;
- h. how and when you use our services;
- i. your employment details;
- j. your financial and tax related information; and
- k. any other information provided at Australia Yinmore Wines' request.

3. How do We collect Personal Information?

We collect Personal Information:

- a. directly from you (when We contact you, when you contact us, when you visit our websites, offices, cellar door or wineries, when you post about Us on social media, when you complete a survey, or enter a competition);
- b. from credit reporting agencies;
- c. from publicly available sources of information; and
- d. from third parties who you have authorised to provide Us with information.

4. How do We hold and secure your Personal Information?

We store your Personal Information in hard copy format and/or digitally, on site and/or with a third-party storage provider, and appropriate information security measures are in place to protect this information. Australia Yinmore Wines takes reasonable physical and electronic steps to keep the personal information we hold secure from unauthorised access, modification, loss and interference.

Unfortunately, no data transmission over the internet can be guaranteed to be fully secure and you need to be aware of this when communication with or providing personal information to Australia Yinmore Wines over the internet.

Australia Yinmore Wines uses data storage providers located both inside Australia and overseas. Where appropriate, Australia Yinmore Wines has agreements with its storage providers to keep all Personal Information they store secure, using reasonable and appropriate security methods.

5. Why do We collect, hold, use and disclose Personal Information?

Australia Yinmore Wines may collect Personal Information for a number of reasons, including:

- a. providing you with products or services;
- b. providing you with information about Our products or services;
- c. developing or refining products or services;
- d. internal business purposes;
- e. providing you with marketing material;
- f. contacting you in relation to Our business activities;
- g. better understanding Our clients and customers;
- h. tailoring Our marketing, services, promotions and operations; and
- i. corporate governance, auditing and record keeping.

Our use of Personal Information may extend beyond these uses, but will be restricted to purposes that We consider to be related to Our functions and activities.

6. What do We do with your Personal Information?

If We collect Personal Information from you, We may:

- a. use that information for any of the purposes in clause 5 of this Policy;
- b. store that information in accordance with this Policy;
- c. pass that information amongst entities We work with;

- d. pass that information to third parties who provide products or services to Us (including Our accountants, auditors, lawyers, IT contractors, and other service providers); or
- e. provide that information to third parties as required by law.

methods as set out in paragraph 13, below. We will review your Personal Information and respond to the request within a reasonable period of time.

7. Do you use my information for Direct Marketing?

We may use your Personal Information to communicate directly with you to promote a product or service (**Direct Marketing**). We use Direct Marketing to provide you with information about products or services that We believe you may be interested in. If you receive Direct Marketing material from us, and do not wish to continue receiving it, please contact Us by any of the methods set out in paragraph 13, below, asking to be removed from all future Direct Marketing programs. Once We have received your opt-out request, We will remove you from Our Direct Marketing programs as soon as reasonably practicable.

8. What about Cookies?

When you access Our website, We may receive information about you via a 'cookie'. A cookie is a piece of information that Our web server may send to your computer when you visit the website. The cookie is stored on your machine, but does not identify you or give Us any information about your computer. A cookie helps Us to recognise when you re-visit the website, and to optimize your experience. We do not collect any Personal Information from you when you use cookies on Our website.

9. Do We ever send your information overseas?

Australia Yinmore Wines may disclose or transfer your personal information where necessary to companies which are "related bodies corporate" or "ultimate holding companies". Generally, we ensure that an international entity is bound by privacy obligations equivalent to the Australian Privacy Principles' Privacy Act 1988 (Privacy Act), before we disclose or transfer your personal information to it.

10. Can you access your Personal Information or request it be corrected?

- a. You may request access to the Personal Information that We hold about you by contacting Us by any of the methods as set out in paragraph 13, below (an **Access Request**).
- b. Upon receiving an Access Request We may request further details from you to verify your identity. We reserve the right not to provide you with access to Personal Information if We cannot verify your identity to Our reasonable satisfaction.
- c. An administrative fee may be charged to cover Our costs in providing you with access to your Personal Information. This fee will be explained to you before it has been incurred.
- d. We will respond to your Access Request within a reasonable period of time by:
 - i. providing you with access to your Personal Information;
 - ii. rejecting your Access Request, and providing you reasons for this rejection.
- e. Access Requests may be denied where:
 - i. We believe your request is frivolous or vexatious;
 - ii. We are entitled to reject it by law;
 - iii. We are unable to verify your identity; or
 - iv. you have not paid the administrative fees referred to in paragraph 10c, above.
- f. If you believe that the Personal Information that We hold is inaccurate or otherwise requires correction, you may send Us a correction request by contacting Us by any of the

11. What happens if you want to deal with Us anonymously or using a pseudonym?

You can deal with Us either anonymously or by using a pseudonym if you choose. If, however, you do so We may not be able to provide you with accurate or useful information, and you may not be able to access a full range of Our products and services.

12. Does this policy ever change?

From time to time We may make changes to this policy. When We do, We will highlight those changes in **bold**. Changes come into effect from the time when they are brought to your attention, or when you next log on to Our website, whichever is earlier. Please make sure you review the Privacy Policy each time you visit Our website to keep up to date on any changes.

13. What happens if you have a question or complain about how We have handled your Personal Information?

If you have a question or complaint, you can raise it with Us by:

Calling Us on 08 7006 0868;

Sending a letter to Australia Yinmore Wines, PO Box 86, Goodwood SA 5034.

We take all complaints seriously and will respond to you within a reasonable period, unless We consider your complaint to be frivolous or vexatious.

If you aren't satisfied with the way We have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.