

## PRIVACY POLICY

This privacy policy (the **Policy**) sets out in accordance with the *Privacy Act 1988* (Cth) the way in which Irvine Wines (ABN 73 585 980 101) and its associated entities (together **Irvine, 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 Irvine's products (online, in writing, by telephone or in person); or
- c. providing Personal Information to Irvine, 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.

If you access our website, we may collect information about how you have used our website.

If you contact us or place an order for goods or services, we may collect your name, address, e-mail address, phone number or contact details.

We may also collect information about:

- a. your age;
- b. your order;
- c. your order history;
- d. your business or associated companies or entities;
- e. your demographic;
- f. your preferences;
- g. the frequency of your purchases or enquiries;
- h. your purchases of products and services related to our activities;
- i. your location;
- j. the technology you use to access our services; and
- k. how and when you use our services.

## 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 place an order, when you visit us or when we visit your premises); and
- b. 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 in our business premises. All hard copy material is secured on site using reasonable and appropriate security measures. We may also store your Personal Information digitally with a third-party storage provider.

All digital material is secured using reasonable and appropriate security measures. Any digital transfer of Personal Information is secured using 256AES encryption.

Irvine uses data storage providers located both inside Australia and overseas, specifically located in the U.S.A. Where appropriate, Irvine 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?

Irvine 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.

## 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. 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?

Irvine uses third-party data storage providers located overseas. Irvine uses third-party service providers to conduct surveys and competitions. Where appropriate, Irvine has agreements with these third-party providers to keep all Personal Information they store secure, using reasonable and appropriate security methods. Any digital transfer of Personal Information is secured using 256AES encryption.

## 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.
- 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 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.

**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 **yellow highlight**. 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:

Emailing: [admin@irvinewines.com.au](mailto:admin@irvinewines.com.au);

Calling Us on (08) 8564 1110

Sending a letter to:

Irvine Wines  
Attn: General Manager  
PO Box 308  
ANGASTON SA 5035

We take all complaints seriously and will respond to you within a reasonable period of time, 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>.