1. Apéro
   1. Privacy Policy
   2. Last updated: 31 March 2021
2. Privacy Statement

Apéro Label Pty Ltd ACN 624 845 567 trading as Apéro (**we/us/our**) consider your privacy to be important and we take our responsibility to protect your personal information seriously.

This Privacy Policy (**Policy**) sets out how we collect, hold, use and disclose information about individuals who deal or interact with us. We treat all personal information collected by us in accordance with this Policy and the *Privacy Act 1988* (Cth) (**Privacy** **Act**). If there is any inconsistency between the Privacy Act and this Policy, the Privacy Act will prevail to the extent of the inconsistency.

1. Personal Information collected by us

Personal information is information or an opinion of an individual whose identity is apparent or can be reasonably ascertained. We collect a variety of personal information that is reasonably necessary for the purposes of conducting and improving our business, our products and our services. This information is collected from a range of sources including:

* + 1. our website *<https://www.aperolabel.com/>* (the **Site**);
    2. creation of Apéro accounts;
    3. purchases;
    4. marketing research;
    5. by otherwise having some form of contact with an individual such as by mail, telephone, email or internet; or
    6. other business activities or events where we interact with people.

Personal information collected by us includes:

* + 1. your name;
    2. your preferred delivery address;
    3. your preferred billing address;
    4. your place of residence;
    5. your contact details such as your mobile number, telephone number and email address;
    6. your gender (however this is generally only incidentally collected);
    7. your transactional data;
    8. your payment details including your credit card information; and
    9. all logs, which may include information such as your internet protocol (**IP**) address, browser type, browser version, clickstream data, the pages of our Site that you visit, the time spent on any pages of our site and other log related information relating to your use of our website.

1. Use of personal information

We automatically gather information to monitor the use of products and services. Much of the data we collect is aggregated and this information is effectively anonymous to us. In general, we use personal information for providing, evaluating, improving, personalising and developing our business and our products.

More specifically we use personal information for:

* + 1. improving our products and customer satisfaction;
    2. providing a product that has been requested;
    3. providing product related support to you;
    4. promoting and delivering our products to you;
    5. our internal research and statistical purposes (including market segmentation and customer value analysis); and
    6. enabling us to forward to you other information or material which we believe may be of interest to you.

1. Disclosure of personal information

We do not disclose your personal information to any third party, other than those requiring such information for the purposes for which the information was collected.

For example, we may provide some of your personal information to:

* + 1. logistics and delivery companies so that they can deliver our products to you that you have purchased through the Site; and
    2. digital marketing companies so that they can provide us with online advertising and marketing strategies (as further described at clause 7).

1. Protecting your personal information
   1. Steps we take

We take reasonable steps to protect all personal information we hold from:

* + 1. misuse, interference and loss; and
    2. unauthorised access, modification or disclosure.

The precautionary steps we take to protect personal information include:

* + 1. adopting measures to protect our computer systems and networks for storing, processing and transmitting personal information;
    2. adoption of procedural and personnel measures for limiting access to personal information by our staff;
    3. regularly reviewing our information collection, storage and processing practices; and
    4. such other security measures we consider reasonable and appropriate from time to time.

Notwithstanding that we use our best endeavours to protect all personal information we collect and hold, we unfortunately cannot guarantee the complete security of all personal information we hold.

* 1. De-identifying and deleting personal information

When your personal information is no longer required to be kept by us, we will take reasonable steps to destroy or delete the personal information in a confidential manner.

1. Third parties

Our Site may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

You acknowledge that we have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party sites, products or services whatsoever.

You should be aware that your ability to opt-out of a third-party tool or platform will depend on the conditions governing your agreement with that third party.

1. Disclosure for advertising and promotional purposes
   1. Site Data

Whenever you visit our Site, our servers automatically record information for statistical purposes about your usage of our Site, such as:

* + 1. the type of browser used;
    2. the referring URL;
    3. the IP address;
    4. the number and type of pages viewed;
    5. the date and time of visits; and
    6. the exit URL.

This information remains anonymous and we do not link it to any personal information, unless at the time of visiting our Site you have logged in to your Apéro Account.

* 1. Disclosure to third parties

We may disclose your Site Data to third party service providers who we engage to improve our Site and our services. These service providers process your Site Data in its aggregated and anonymised form.

We only disclose your Site Data so that we can create effective digital marketing strategies, as well as in the pursuance of our legitimate business interests.

* 1. Direct Marketing

Where your personal information is being used for promotional or marketing purposes, whether provided by us, an associated entity or a third party, we will obtain your consent. You may at any time decline to receive further offers by opting out.

Please be aware that opting out of a direct marketing communication will only unsubscribe you from the enterprise that sent you have contacted directly. Please let us know if you want to unsubscribe from all direct marketing that originates from us (excluding our associated entities) by emailing hello@aperolabel.com.

1. Overseas Disclosure
   1. Overseas IT service providers

We may disclose personal information to outsourced information technology service providers, including cloud computing providers and data storage providers, based overseas.

We will take reasonable steps to ensure such overseas recipients do not breach the Australian Privacy Principles (**APP’s**) or are subject to laws or a scheme substantially similar to the APP’s.

* 1. Disclosure for analytics

We may use Google Analytics to track usage of our Site. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of the Site, to prepare reports on the Site’s activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal data collected by Google includes cookie and usage data, which is processed in the USA. You can find Google's privacy policy here: http://www.google.com.au/policies/privacy/.

* 1. Consent to overseas disclosure

Other than as contemplated under this point 8, we will only disclose your personal information to an overseas recipient if:

* + 1. you consent to the transfer; or
    2. the disclosure of the information is required or authorised by or under an Australian law, other applicable law or a court/tribunal order.

1. Cookies

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some features of our site.

1. Web beacons

Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to Cookies, and are used to track the online movements of web users or to access Cookies.

Unlike Cookies which are stored on the user’s computer hard drive, web beacons are embedded invisibly on web pages (or in e-mail).

Web beacons may be used to deliver or communicate with Cookies, to count users who have visited certain pages and to understand usage patterns.

Like many sites, we use web beacons to collect information which is done in accordance with this policy.

1. Accessing and updating your personal information

If you have established an Apéro account with us, your personal information is open and freely available for you to access through our Site following your log on.

If you are an individual who has provided personal information to us outside of our Site and account creation process, you may request access to it at any time. If you wish to obtain access, please send your request by email to us. Depending upon the personal information you seek to access, you may be asked:

* + 1. to put your request in writing with evidence of your identity to verify that you are who you say; and
    2. to provide further details to assist us in responding to your request in a timely manner.

We will respond to a request for access to personal information within a reasonable period after the request is made.

* 1. Access to Personal Information

We will provide you with access to your personal information held by us unless:

* + 1. giving access would be unlawful; or
    2. denying access is required under the Privacy Act or any other applicable law.
  1. Amending your personal information

We endeavour to keep all personal information we hold accurate, up to date and complete. If at any time you wish to correct any of your personal information, please contact us.

If we elect not to correct your information, we will notify you, within a reasonable time, of the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the Privacy Act.

If you wish to have your Personal Information deleted, please let us know and we will take all reasonable steps to delete it, unless we need to keep it for legal reasons.

1. General Data Protection Regulation (GDPR)

To the extent that the GDPR applies, including where our Site is accessed by individuals in the European Union, we will:

* + 1. provide users with information about, and obtain any required consents for:
       1. our use of cookies and/or other storing and/or accessing of information stored on users’ devices; and
       2. our processing of users’ personal data for personalised advertising purposes.

1. International Users

If you are located outside Australia and choose to provide your personal information to us, your personal information will be transferred to Australia and processed within Australia.

If you are based in the European Union, or your data is otherwise protected by the European Union General Data Protection Regulation (**GDPR**), you may contact us directly or, alternatively, you may contact our EU Representative:

Name: [Insert]

Address: [Insert]

Phone: [Insert]

For Privacy Issues Email: [Insert]

1. Complaints

If you believe that we have used or disclosed your Personal Data in a manner which is contrary to this Privacy Policy or otherwise breaches an applicable law, then you should contact us using the contact information in this Privacy Policy. We will happily work with you to address any concerns that you may have.

If you are based in the European Union and have a complaint regarding your Personal Data, you may also contact our European Representative using the contact information contained in clause 2 of this Privacy Policy.

Within 30 days of receipt of your complaint we will notify you in writing as to what action we propose to take in relation to your complaint and will provide you with details of what further action you can take if you are not satisfied with our response.

You also have the right to lodge a complaint with the relevant supervisory authority in your jurisdiction. If you are in Australia, you may lodge your complaint with the Office of the Australian Information Commissioner. Information on making a privacy complaint can be found on their website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

If you are unsure who your relevant supervisory authority may be, please contact us so that we may provide you with assistance.

1. Variations

We reserve the right to vary this Policy from time to time without further notice to you. Any variations made will be updated on our Site. It is your responsibility to check this Policy every now and again to ensure you are aware of any changes made to it. We will not reduce your rights under this Policy without using our best endeavours to first provide you with notice.