

# PRIVACY POLICY

Sirromet Wines Pty Ltd

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Sirromet Wines Pty Ltd is committed to protecting the Personal Information it collects, and is bound by the National Privacy Principles. This Privacy Policy outlines the way in which we handle your Personal Information:

## 1. COLLECTION

- 1.1 We collect the information you give us when you use our web site [www.sirromet.com](http://www.sirromet.com) to register to receive additional information, enter competitions or receive products from us. When you register, we ask you for Personal Information about you, such as your name, birth date, postal address and e-mail address.
- 1.2 We may supplement the information that you provide with information that is received from third parties. For instance, if inaccurate postal or zip codes are received, we may use third party software to fix them.
- 1.3 We may collect email addresses from prospect lists of other companies, for example, via Partner Co-Marketing efforts. However we ensure that:
  - (a) we provide an easy way for you to opt out of future emails from us.
- 1.4 We may use rented email lists, but only if the list is specifically an opt-in list, that is, lists of people who have explicitly agreed to receive email messages from third parties.
- 1.5 We may also collect personal details directly from individuals at marketing events such as trade shows and exhibitions, or visitors to The Winery.

## 2. USE AND DISCLOSURE

- 2.1 We process your Personal Information only for specific and limited purposes. We ask only for data that is adequate, relevant and not excessive for those purposes. When we ask you for Personal Information, we tell you the purposes for which we will process that data. Some of these purposes include the following:
  - (a) we may contact you occasionally to inform you of new services we will be providing, or special offers, events or articles we think will be of interest to you.
  - (b) we may send you regular updates by e-mail or by post on Sirromet Wines Pty Ltd organised or related events.
  - (c) we may send you requested product information and promotional material.
  - (d) we may use your Personal Information for marketing purposes and market research.
  - (e) we may use your Personal Information internally to help us improve our products and services and to help resolve any problems.
- 2.2 We do not share, sell or distribute your Personal Information with unrelated third parties, except under these limited circumstances:
  - (a) Personal Information may occasionally be transferred to third parties who act for or on behalf of Sirromet Wines Pty Ltd, or in connection with the business of Sirromet Wines Pty Ltd for further processing in accordance with the purposes for which the data was originally collected or for purposes to which

you have subsequently consented. For example, sometimes a third party may have access to your Personal Information in order to handle our mailings on our behalf.

- (b) We may share or transfer the information in our databases to comply with a legal requirement, for the administration of justice, to protect your vital interests, to protect the security or integrity of our databases or this Web Site, to take precautions against legal liability, or in the event of a corporate sale, merger, reorganisation, dissolution or similar event.

- 2.3 Where appropriate, before disclosing Personal Information to a third party, we contractually require the third party to take adequate precautions to protect that data.

### **3. DATA QUALITY**

- 3.1 We strive to maintain the reliability, accuracy, completeness and currency of Personal Information in our databases and to protect the privacy and security of our databases.

### **4. DATA SECURITY**

- 4.1 Our servers and our databases are protected by industry standard security technology, such as industry standard firewalls and password protection.
- 4.2 When we process sensitive data that requires industry standard Secure Socket Layer (SSL) encrypted browsers. We use 128-bit encryption to protect transmissions over the Internet.
- 4.3 The employees who have access to Personal Information have been trained to handle such data properly and in accordance with our security protocols and strict standards of confidentiality. Although we cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data, we take reasonable precautions to prevent such unfortunate occurrences.

### **5. OPENESS**

- 5.1 This Privacy Policy has been distributed amongst all Marketing and Customer Service staff and is readily available to any other staff member. A customer may request to view a copy of this document either electronically or hard copy.
- 5.2 If you do not wish to receive information from us and want to be removed from our standard mailing list, please notify us via telephone, in writing, e-mail us at [wines@sirromet.com](mailto:wines@sirromet.com), or unsubscribe using the prompts at the bottom of the e-marketing message if applicable.

## **6. ACCESS AND CORRECTION**

- 6.1 Upon receipt of your written request and enough information to permit us to verify your identity and identify your Personal Information, we will disclose to you the Personal Information we hold about you. We will also correct, amend or delete any Personal Information that is inaccurate.
- 6.2 If you wish to access or correct your Personal Information, please write to our data protection officer at Sirromet Wines, PO Box 1332, Capalaba QLD 4157. Requests to delete Personal Information are subject to any applicable legal and ethical reporting or document retention obligations imposed on Sirromet Wines Pty Ltd.

## **7. IDENTIFIERS**

- 7.1 Identifiers are not used to identify names within the database, with the exception of paying members (Club Sirromet). Club Sirromet members are assigned a personalised account/customer number at the commencement of their membership.

## **8. ANONYMITY**

- 8.1 Due to the nature of our business, it is not possible for customers to purchase our products by remaining anonymous.

## **9. TRANSBORDER DATA FLOWS**

- 9.1 Sirromet Wines Pty Ltd conducts business globally and has facilities and databases in different countries. We may, from time to time, transfer your Personal Information to one of our databases in another country. If the level of privacy protection in a country does not comply with recognised international standards, we will ensure that data transferred to our databases in that country are adequately protected and that the transfer of data to third parties in such countries is made pursuant to a contract or other measures providing adequate protection.

## **10. SENSITIVE INFORMATION**

- 10.1 We do not collect Sensitive Information from our customers, as it is not relevant to our business.

## **11. CONCLUSION**

If you have any questions about this Privacy Policy or concerns about the way we process your Personal Information, please contact us by e-mailing us at [wines@sirromet.com](mailto:wines@sirromet.com) or write to Sirromet Wines PO Box 1332, Capalaba QLD 4157.