

FIORENTE ELDERFLOWER LIQUEUR PRIVACY POLICY

INTRODUCTION

The Fiorente Elderflower liqueur Australia website <https://fiorenteliqueur.com.au> and its contents (the "Site") are owned by Spirits Platform Pty Ltd. ACN 604 520 783 ("SPIRITS PLATFORM"). This Privacy Policy describes the way in which SPIRITS PLATFORM ("us", "we") use and discloses information obtained by us from your use of the Site: when you order products; when you register on this Site; when you subscribe to our mailing list; when you enter a competition; and/or when you make contact with us by sending us an email. By visiting the Site you are agreeing with and consenting to the practices described in this Privacy Policy. If you do not agree with this Privacy Policy you should immediately cease using the Site. As this Policy may be updated from time to time as the Site and its content develops and matures, we encourage you to check this Policy regularly.

INFORMATION COLLECTED BY US

We may collect personal information, such as your name and email address, and sometimes other contact details such as your residential address and telephone numbers. We collect this information generally to fulfil the purpose for the collection. We will tell you why we are collecting information, when we collect it, and how we plan to use it, or these things will be obvious when we collect the information. We collect personal information directly from you, in a number of ways, including: when you order products; when you register on this Site; when you subscribe to our mailing list; when you enter a competition; and when you make contact with us by sending us an email. Except as expressly provided for in this Privacy Policy, if you provide information about yourself by registering on a page on this Site, by filling out one of our surveys, or otherwise by voluntarily telling us about yourself or your activities, we will collect that personal information for SPIRITS PLATFORM's own internal use. Except as may be necessary, only designated and authorised SPIRITS PLATFORM sales and marketing employees will use the information you give us, in connection with their duties. This will be for the purposes of identifying consumer preferences, improving our products and services, and the content of this Site. When you give us your first and last name, birthdate, email, day and evening telephone numbers, or postal address, we may contact you by email, regular mail, or telephone from time to time with information about our new products and services, special offers, upcoming events and competitions. If you do not provide any of the information required, we may not be

able to provide you with the services that you request. If you do not wish to be contacted by all or any of these methods, you may let us know by sending an email message to us at fiorentespiritsplatform.com.au. Please be sure to give us your exact name and address so we can be sure that we remove your name from our lists. We do not knowingly solicit or collect personal information from or about children, and we do not knowingly market our products or services to children.

INFORMATION STORED & OBTAINED FROM “COOKIES”

The Site makes use of a feature of Internet web browsers called “cookies”; small pieces of information stored by your browser on your computer’s hard drive. The use of cookies allows your browser to remember some specific information relating to you and your use of the Site and helps us to make your use of the Site easier by storing information about your preferences. Whenever you visit our Site, we will check with your browser for the presence of our cookies, which contain information such as whether you have visited the Site before and your preferences for our Site.

OUR USE AND DISCLOSURE OF YOUR INFORMATION

We are committed to the protection of your privacy and your personal information. We will comply with this Privacy Policy and any other applicable laws relating to privacy, data collection and the use of information that are currently enacted or may be enacted in the future. As a guiding principle, we use information that is collected: to operate the Site; to provide you with a product or a service you have requested from the Site; to help us gain a better understanding of your likes and dislikes, so as to improve the Site (and other sites run by us), our marketing strategies and/or the products and services generally offered by us. We may contact you by any means, including without limitation to, mail, telephone, and email or via SMS. We may also use the information collected to notify you about changes to the Site, and to inform you of services and special offers that we think you’ll find valuable. From time to time we may also use the information to send you information about us and possibly about third parties (we shall send such information directly to you – your information will not be provided to third parties). In all instances, if you do not want to receive such offers, you will be able to “opt out” from receiving them. To facilitate our efficient use of your information, and to provide you with the services or products requested by you, it may sometimes be necessary for us to disclose your information to third parties. However, this disclosure shall only occur in the following circumstances:

1. To Our Employees, Contractors & Agents

We may engage or employ other companies and individuals to perform functions on our behalf. Examples may include, but are not limited to processing credit card payments, fulfilling orders and delivering products, analysing data, providing marketing assistance, providing legal or accounting advice and/or providing information technology and related services. Such parties will have access to only that personal information required by them to perform their functions, and may not use such information for any other purposes.

2. Aggregated Statistical Information

We may provide aggregated statistical information about access patterns, navigational techniques, product sales, etc. to reputable third parties. However, in all instances such information will simply comprise aggregated data collected about you and other users, and will not include any direct personal information that identifies you as our customer.

3. Where Required By Law

In certain circumstances we may be required by law to disclose your personal information, for example, where disclosure is ordered by a Court, or subpoenaed in relation to third party litigation. We also reserve the right to choose to disclose your information to law enforcement agencies in circumstances described in the National Privacy Principles and other applicable laws and regulations, including for the purpose of investigating alleged contraventions of the law.

WITH YOUR CONSENT

Other than as outlined above, we will endeavour to provide you with notice (which may occur via your nominated email) when we wish to provide personal information about you to third parties, and provide you with the opportunity to choose not to share that information.

A FURTHER WORD ON “COOKIES”

As noted earlier in this Policy, this Site makes use of a feature of Internet browsers called “cookies”. Cookies help us to “remember” your preferences in relation to the Site. By showing how and when you use our Site, cookies help us see which areas are popular and which are not, and to tailor the Site accordingly. The use of cookies is an industry standard and you’ll find most major web-sites use them. If you prefer not to receive cookies you can adjust you Internet browser to refuse cookies or to

warn you when cookies are being used. A number of third party products are also available to remove cookies from your computer. However, the vast majority of our Site will not function if cookies have been turned off, and setting your browser to “warn” you when cookies are used will reduce your enjoyment of the Site. For this reason we strongly recommend that you leave cookies fully functional. Of course, we never use cookies to retrieve information from your computer that was not originally sent by us, do not allow or share third party access to cookies placed by our Site, and except as outlined above, do not share any information obtained from them with any third parties.

HOW SECURE IS MY INFORMATION?

We attempt to keep our server secure and free from unauthorised access and use, by enforcing physical security at the premises in which the server is located, and by using industry standard technological measures to prevent unauthorised remote access to the server. Sensitive information, such as credit card and related financial information that is transmitted to and from our servers is secured using encryption methods. Unfortunately, no server on the Internet nor any data transmission over the Internet can be guaranteed to be 100% secure. Despite our best efforts to keep our server and transmissions to and from our server secure, we are unable to absolutely guarantee security and there will always be a risk of unauthorised access to your information. Although we will take all reasonable steps to keep secure any information that we hold about you, we will not be held responsible for events arising from unauthorised access to such information.

ACCESSING AND CHANGING YOUR INFORMATION

The information that you provide to use is kept in a secure environment to which access is granted only to authorised persons. If you wish to access or correct any personal information we hold about you or have any feedback or concerns about privacy, please contact us by sending us an email to fiorente@spiritsplatform.com.au. Where you seek a response from us, we will let you know who will be handling your matter and when you can expect a full response. In the case of access and correction requests, please provide as much detail as you can about the particular information you seek, in order to help us retrieve it. Under the Privacy Act and other relevant laws, we are required to provide our reasons if we refuse your request. Where we decide not to make a requested connection and you disagree, you may ask us to make a note of your requested correction with the information.

LINKS TO OTHER SITES

The Site contains links to other sites. With the exception of other sites owned by us, we do not control the information collection of sites reached through links from this Site. If you have any questions about the information collection policies of those sites then you should contact the companies controlling those sites directly.

NO GUARANTEE OF COLLECTION BY US

Despite the information about you that we may collect, we are not responsible for collecting or storing any of that information, and do not guarantee that we will. You are responsible for keeping your own records relating to your use of the Site and any transactions conducted via it, and for complying with any applicable record keeping legislation.

HOW CAN YOU COMPLAIN ABOUT OUR MANAGEMENT OF PERSONAL INFORMATION?

If you wish to complain about a breach of the privacy rules that bind us, you may contact us by email to fiorente@spiritsplatform.com.au. We may ask you to provide further details about your complaint. We may discuss your complaint with our personnel and our service providers and others as appropriate. We will investigate the matter and attempt to resolve it in a timely way. We will inform you in writing about the outcome of the investigation. If we do not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, we will inform you that your complaint may be referred to the Privacy Commissioner for further investigation and will provide you with the Commissioner's contact details.

OUR CONTACT DETAILS

If we become aware of any ongoing concerns or problems with the Site, we will take the issue seriously and work to address your concerns. If you have any queries about this Privacy Policy, or have a problem or complaint, then you should contact us by sending an email to fiorente@spiritsplatform.com.au.