

PRIVACY POLICY

This is the main privacy policy for Origin Wine and for certain services provided through these and other Origin Wine websites and applications (“our sites”) by Origin Wine (“OW”).

At OW we collect different types of information about our customers for two main reasons:

1. To help us to monitor and improve the products we offer.
2. If we have permission from the user, to market services to them.

There may be other privacy policies that apply to certain services we provide. Please read these when you register or subscribe for these services on these sites.

Our principles

1. We do our very best to protect your privacy by using security technology appropriately. This means:

- we make sure that we have appropriate security measures to protect your information; and
- we make sure that when we ask another organisation to provide a service for us, they have appropriate security measures.

2. We will respect your privacy. You should receive marketing emails only from us and, if you agree, from other organisations we have carefully chosen. We will make sure it is clear when you can make these choices, for example, we have boxes you need to tick if you want to receive marketing. However, we may email you occasionally with information or questions about your registration, your subscription account or postings, for example, with reminders, warnings or copyright requests.

3. We will collect and use individual user details only if we have your permission or we have sensible business reasons for doing so.

4 We will be clear in our dealings with you as to what information about you we will collect and how we will use it.

5 We will use personal information only for the purposes for which it was originally collected and we will make sure we delete it securely.

6 Our site is accessible via the internet. This means that people around the world who access our website can see anything you post on the website.

7 If we or our service providers transfer any information out of the European Economic Area (EEA), it will only be done with the relevant protection (stated under UK law) being in place.

We collect information on you:

- when you use the website
- through cookies
- if you choose to reveal information in postings, and
- when you enter sales promotions and competitions.

Registration

The minimum information we need to register you is your name, email address and a unique number. We will ask you more questions for different services, including sales promotions. Unless we say otherwise, you have to answer all the registration questions.

We may also ask some other, voluntary questions during registration for certain services (for example, professional networks) so we can gain a clearer understanding of who you are. This also allows us to personalise services for you.

To assist us in our marketing, in addition to the data that you provide to us if you register, we may also obtain data from trusted third parties to help us understand what you might be interested in. This 'profiling' information is produced from a variety of sources, including publicly available data (such as the electoral roll) or from sources such as surveys and polls where you have given your permission for your data to be shared. You can choose not to have such data shared with OW from these sources by logging into your account and changing the settings in the privacy section.

After you have registered, and with your permission, we may send you emails we think may interest you. At any time you can decide not to receive these emails and will be able to 'unsubscribe'.

Logging in using social networking credentials

If you log-in to our sites using a Facebook log-in, you are granting permission to Facebook to share your user details with us. This will include your name, email address, date of birth and location which will then be used to form an OW identity. You can also use your picture from Facebook as part of your profile. This will also allow us and Facebook to share your, networks, user ID and any other information you choose to share according to your Facebook account settings. If you remove the OW app from your Facebook settings, we will no longer have access to this information.

If you log-in to our sites using a Google log-in, you grant permission to Google to share your user details with us. This will include your name, email address, date of birth, sex and location which we will then use to form a Guardian identity. You may use your picture from Google as part of your profile. This also allows us to share your networks, user ID and any other information you choose to share according to your Google account settings. If you remove OW from your Google settings, we will no longer have access to this information.

If you log-in to our sites using a twitter log-in, we receive your avatar (the small picture that appears next to your tweets) and twitter username.

Use of children's data

We do not knowingly collect or store any personal information about children under the age of 16.

Who we share data with

Depending on where you live, your personal information may be shared with the OW group of companies that are based in the UK, South Africa and Belgium. We will not share your personal information with others for marketing purposes unless you have given us your permission. If we have your permission, we will share your information only with other organisations we have chosen carefully.

We can access and release personal information to keep to relevant laws and government requests, to operate our systems properly and to protect both us and our users.

Use of Cookies

We use cookies for a number of reasons.

1 For statistical purposes to track how many users we have and how often they visit our websites. We collect information listing which of our pages are most frequently visited, and by which types of users and from which countries.

2 We use other organisations to collect anonymous user information, sometimes through cookies and web beacons, (information embedded in images which allow them to analyse how the website is being used and the number of visitors).

3 Placing cookies on your computer means we can show you adverts that you might be interested in, and allows us to control the number of times you see them and measure how effective the ad campaign has been. Advertising helps us to keep the site free for you to use. You can find more information on this in the [Online Behavioural Advertising section](#) of this privacy policy, including how you can 'opt out'.

By using the sites you are agreeing to the use of cookies as described.

Google Analytics

We use Google Analytics on our sites for anonymous reporting of site usage and for advertising on the site. If you would like to opt-out of Google Analytics monitoring your behaviour on our sites please use this link (<https://tools.google.com/dlpage/gaoptout/>)

Legal information and how to contact us

Under the UK Data Protection Act 1998 we have to say who the 'data controller' is for Origin Wine and services provided through our websites. The data controller is the organisation responsible for protecting information and, in our case, is Manifest London, Manifest London Ltd.. 8-14 Vine Hill, London, EC1R 5DX.

If you would like access to or a copy of the personal information we hold about you, to request a correction, or have any questions about how we may use it or to make a complaint, please contact the Data Protection Manager at the address shown above.

Complaints will be dealt with by the Data Protection Manager, and will be responded to within 30 days at the latest.

If you are not satisfied with the way your complaint was handled, you may be able to refer your complaint to your local data protection regulator. In the United Kingdom this is the Information Commissioner's Office.

Changes to the privacy policy

Should we elect to change our privacy policy we will post the changes here. Where required by law, will we obtain your consent to make these changes.