

# Privacy Policy

## 1. Sip The Snowies commitment to privacy

Sip The Snowies (ACN 654 429 115) (“**Sip The Snowies**”) is committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth) (“**Privacy Act**”) and in accordance with other applicable privacy laws.

This document sets out our policies for managing your personal information and is referred to as our “**Privacy Policy**”.

In this Privacy Policy, “we” and “us” refers to Sip The Snowies and “you” refers to any individual about whom we collect personal information.

## 2. About Sip The Snowies

Sip The Snowies is a proprietary limited company.

Sip The Snowies offers a complete range of services, including winery tours.

## 3. What information does Sip The Snowies collect about you?

### (a) Customers and prospective customers

When you enquire about our services or when you become a customer of Sip The Snowies, a record is made which includes your personal information.

The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:

- (i) your name, e-mail, postal address and other contact details;
- (ii) your age or date of birth;
- (iii) credit card information;
- (iv) details of the services we have provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries;
- (v) information you provide to us through customer surveys; and
- (vi) any additional personal information you provide to us, or authorise us to collect, as part of your interaction with Sip The Snowies.

### (b) Prospective employees or applicants

We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you.

We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background

checks to determine your suitability for certain positions (for example, positions which involve working with children).

(c) Other individuals

Sip The Snowies may collect personal information about other individuals who are not customers of Sip The Snowies. This includes customers and members of the public who participate in events we are involved with, individual service providers and contractors of Sip The Snowies, and other individuals who interact with Sip The Snowies on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with Sip The Snowies. Generally, it would include your name and other contact details.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

In limited circumstances, Sip The Snowies may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by Sip The Snowies, we may collect health information about you in an emergency or otherwise with your consent.

We may collect personal information about children (for example, when children participate in events we are involved with). Where children do not have sufficient maturity and understanding to make decisions about their personal information, we will require their parents or guardians to make decisions on their behalf.

You can always decline to give Sip The Snowies any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

(d) Visitors to our websites

The way in which we handle the personal information of visitors to our websites is discussed below.

#### **4. How and why does Sip The Snowies collect and use your personal information?**

Sip The Snowies collects personal information reasonably necessary to carry out our business, to assess and manage our customers needs, and provide services including winery tours. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you or third parties and managing customer relationships.

The purposes for which Sip The Snowies usually collects and uses personal information depends on the nature of your interaction with us, but may include:

- (a) to enable you to access and use our website and our services ;
- (b) to operate, protect, improve and optimise our website , services , business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- (c) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;

- (d) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- (e) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- (f) to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- (g) to consider your employment application.

Sip The Snowies generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example third party suppliers and contractors who assist us to operate our business.

## **5. Does Sip The Snowies use your personal information for direct marketing?**

We and/or our carefully selected business partners may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (eg an unsubscribe link).

If you opt-out of receiving marketing material from us, we may still contact you in relation to its ongoing relationship with you.

## **6. How does Sip The Snowies interact with you via the internet?**

You may visit our websites ([www.sipthesnowies.com.au](http://www.sipthesnowies.com.au)) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to Sip The Snowies will be managed in accordance with this Privacy Policy.

Sip the Snowies' websites use cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.

You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

Sip The Snowies may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

Sip The Snowies' websites may contain links to third-party websites. Sip The Snowies is not responsible for the content or privacy practices of websites that are linked to our website.

## **7. Can you deal with Sip The Snowies anonymously?**

Sip The Snowies will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Sip The Snowies to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

## **8. How does Sip The Snowies hold information?**

Sip The Snowies stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

Sip The Snowies maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.

We take steps to destroy or de-identify information that we no longer require.

## **9. How does Sip The Snowies use and disclose personal information?**

### **(a) For customers and participants**

If you are a customer or participant in an event, we may disclose your personal information to our customers and venues where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

### **(b) Disclosure to contractors and other service providers**

Sip The Snowies may disclose information to third parties we engage in order to provide our services, including wineries, contractors and service providers used for market research, website maintenance/development, mail-outs, data processing and customer

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

### **(c) Use and disclosure for administration and management**

Sip The Snowies will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- (i) administering billing and payments and debt recovery;

- (ii) planning, managing, monitoring and evaluating our services;
  - (iii) quality improvement activities;
  - (iv) statistical analysis and reporting;
  - (v) training staff, contractors and other workers;
  - (vi) risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
  - (vii) responding to enquiries and complaints regarding our services;
  - (viii) obtaining advice from consultants and other professional advisers; and
  - (ix) responding to subpoenas and other legal orders and obligations.
- (d) Other uses and disclosures

We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

## **10. How can you access or seek correction of your personal information?**

You are entitled to access your personal information held by Sip The Snowies on request. To request access to your personal information please contact our privacy officer using the contact details set out below.

You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

## **11. What should you do if you have a complaint about the handling of your personal information?**

You may contact Sip The Snowies at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the privacy officer at the contact details set out below.

The privacy officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Sip The Snowies may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au).

## **12. How changes are made to this Privacy Policy?**

Sip The Snowies may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

## **13. How can you contact Sip The Snowies?**

The contact details for Sip The Snowies are:

Jennifer Pickett

[hello@sipthesnowies.com.au](mailto:hello@sipthesnowies.com.au)

This Privacy Policy was last updated in March 2023.