

## **Privacy Policy**

### **1. Introduction**

- 1.1 The Constellation Wines Australia Group of Companies (**Constellation Wines Australia**) has a commitment to privacy in accordance with the Privacy Act 1988 (Cwth) (**Privacy Act**) and the guidelines and policies of the Australian Privacy Commissioner. This Privacy Policy relates to the way Constellation Wines Australia collects, uses and manages personal information.
- 1.2 "Personal information" means information or an opinion recorded about an individual that makes the individual's identity reasonably apparent or ascertainable. Constellation Wines Australia views the privacy of personal information as an important issue.
- 1.3 In adopting this Privacy Policy, Constellation Wines Australia does so on the basis that it does not replace or limit the requirements of the Privacy Act.

### **2. Manner and purpose of collection of personal information**

- 2.1 Constellation Wines Australia will only collect personal information that is directly related to and necessary for its dealings with the individual concerned. The type of information Constellation Wines Australia collects includes, but may not be limited to, information provided at its request, names and addresses and, when a person uses Constellation Wines Australia's web site, that person's domain name, e-mail address, and information on what pages are accessed.
- 2.2 Constellation wines Australia will only use personal information for a purpose to which the information is relevant unless:
  - The individual has consented to the use of the personal information for other purposes; or
  - its use for another purpose is required or permitted by law.

### **3. Accuracy and completeness of personal information**

- 3.1 Constellation Wines Australia will assume that any personal information provided by a person is up to date and complete at the time it is provided, is free from errors and omissions, is not misleading or deceptive and complies with all relevant laws.
- 3.2 Constellation Wines Australia relies on the personal information provided to it by individuals. Constellation Wines Australia does not undertake to check or verify the accuracy of the personal information obtained from the individual or other persons.
- 3.3 Persons who provide personal information to Constellation Wines Australia should provide details of any changes to that personal information as soon as reasonably practicable following the change.
- 3.4 In some instances, the personal information held by Constellation Wines Australia may incorporate or summarise views, guidelines or recommendations of third parties. Constellation Wines Australia will

endeavour to assemble and record such personal information in good faith, but cannot guarantee that it will necessarily involve a considered review of the information.

#### **4. Disclosure of personal information**

Constellation Wines Australia does not permit the personal information it holds to be disclosed to third parties unless:

- the individual concerned has consented or requested the personal information to be provided to a third party; or
- Constellation Wines Australia is required or permitted by law to provide the personal information to a third party.

#### **5. Accessing personal information**

5.1 If a person wishes to access their personal information held by Constellation Wines Australia, or to complain about possible breaches of privacy, enquiries should be directed to:

Privacy Officer

Constellation Wines Australia

Reynell Road, Reynella SA 5161

Facsimile 08 8392 2122

e-mail [privacy@cwines.com.au](mailto:privacy@cwines.com.au)

5.2 The Privacy Officer will endeavour to deal all inquiries or complaints as soon as is reasonably practicable

#### **6. Variation of Privacy Policy**

Constellation Wines Australia may vary the terms of this Privacy Policy from time to time.

**21 December 2001**