

# FREE THE WINE PRIVACY POLICY

Effective June 22 2011

This Privacy Policy outlines what specific information is gathered on the Free The Wine site and how that information is used. If, at any time, you have questions or concerns about our privacy practices, please feel free contact us.

## **Information Collection and Use**

Free The Wine explicitly asks when we need information that personally identifies you (“Personal Information”). Your personal information is used to create your personal access to our email marketing product, our Sellwine product and to contact you in the course of using these products.

Any financial information that is collected is used to verify, identity and to bill either you or your company for products and services, as applicable. Demographic and profile data collected by Free The Wine may be used to tailor this web site or any requested email communications, and to display information that is more relevant to you.

Free The Wine also compiles demographic and product use information, but in the aggregate only, and may make that aggregate information publicly available. Under no circumstances will Free The Wine make any personal information about an individual user available to anyone. Your email address is used to only send you information that you have requested.

Free The Wine adheres strictly to permission-based email policy. Except as mentioned above, Free The Wine will not send you unsolicited email information, commercial offers or advertisements. Free The Wine will not sell, rent, or loan our contact lists or our customer’s contact lists (including customer data) to any outside firms nor will Free The Wine use customer contact lists for our own marketing purposes.

All emails that you have requested will have an option to unsubscribe. Unsubscribe requests are fulfilled within minutes and no further communications will be sent to users who have stated that they do not wish to receive the specified information.

## **Create Send email marketing – Subscriber Lists, Customer lists, Campaign Content and Campaign Reports**

Free The Wine does not use any of your subscriber lists, email content and reports from Create Send. Free The Wine may scan the content of your campaigns to ensure it complies with our terms of use— to protect against defamatory, inaccurate, abusive, obscene, profane, or threatening material that is racially or ethnically offensive. Free The Wine will not sell, rent, loan or invite external access to a customer’s contact lists. Nor will Free The Wine themselves use customer’s contact lists for any purpose.

## **Sellwine ecommerce cart – customer lists and orders, product details, promo codes and special offers**

Free The Wine does not use any customer lists and orders, product details, promo codes and special offers from your Sellwine console. Free The Wine may scan the content of your cart to ensure it complies with our terms of use— to protect against defamatory, inaccurate, abusive, obscene, profane, or threatening material that is racially or ethnically offensive. Free The Wine will not sell, rent, loan or invite external access to a customer’s contact lists. Nor will Free The Wine themselves use customer’s contact lists for any purpose.

## **Communications from the Site**

### *Special Offers and Updates*

Established users will occasionally receive information on products, services, special deals, and a

newsletter. Out of respect for the privacy of our users we present the option to not receive these types of communications. Customers can unsubscribe via the unsubscribe mechanism at the bottom of each email.

#### *Newsletter*

If a user wishes to subscribe to our newsletter, we ask for contact information such as name and email address. Out of respect for our users privacy we provide a way to opt-out of these communications via the unsubscribe mechanism at the bottom of each email.

#### *Service Announcements*

On rare occasions it is necessary to send out a strictly service related announcement. For instance, if our service is temporarily suspended for maintenance we might send users an email. Generally, users may not opt-out of these communications, though they can deactivate their account. However, these communications are not promotional in nature.

#### *Customer Service*

We communicate with users on a regular basis to provide requested services and in regards to issues relating to their account we reply via email or phone, in accordance with the user's wishes.

#### *Website Usage Information*

We use your IP address to help diagnose problems with our server, and to administer our Web site. We do not link your IP address to any personally identifiable information. We use tracking information to determine which areas our site users visit based on traffic to those areas. Free The Wine does not track what individual users read, but rather how often each page is visited. This helps us maintain a superior and informative website for you.

#### *Security Technology*

Free The Wine acts as a reseller for web hosting and email marketing. We use Net Registry, Distribute IT, and Freshview Pty Ltd to provide web hosting and email marketing hosting. These companies have their own policies in place for securing and accessing data stored by them. Free The Wine makes no claim or warrants any responsibility for the data security for these third parties. Free The Wine acts as a reseller, in providing our clients with access to services provided by third parties. We give no guarantee on the investment that any third party that we recommend to clients is using the latest server, database, backup and firewall technologies to protect any information assets nor that any third party has the capability to maintain safeguards to protect the security of data servers and any personally identifiable information.

#### *Policy Modifications*

We may change this Privacy Policy from time to time. If/when Free The Wine makes changes to this privacy statement, we will highlight the changes on our homepage via the policy link in our website footer. We will post any changes here, so be sure to check back periodically. However, please be assured that if the Privacy Policy changes in the future, we will not use the personal information you have submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy, without your prior consent.

#### *Contacting Free The Wine about Privacy*

If you have any questions about our privacy statement, the information we have collected from you online, the practices of this site, or your dealings with this web site, please contact us:

Postal Address

PO box 1447 Margaret River 6285

Telephone: 0418808993

Fax: who uses a fax?

Email: [info@freethewine.com](mailto:info@freethewine.com)