



# Privacy Policy

**GLOBAL FOOD & WINE**

**Date:** September 2022

**Version:** 2.2



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## Privacy Policy

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### Overview

**Global Food & Wine (referred to as 'Global', 'we' or 'us') includes Global Food & Wine Holdings Pty Ltd and its subsidiaries.**

**This Privacy Policy applies to all Global subsidiaries unless that subsidiary has adopted a separate policy.**

**Global is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the *Privacy Act 1988 (Cth)*. This Privacy Policy sets out how Global handles all personal information.**

**This Privacy Policy does not apply to personal information collected by Global that is exempted under the Privacy Act, for example employee records.**

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### Why we have this policy

Global is committed to supporting the Australian Privacy Principles (APP), which came into force on 12 March 2014, which set clear standards for the collection, access, storage and use of personal information which we obtain as part of our business operations.

Our respect for our customer's right to privacy of their personal information is very important to us. This policy outlines the way in which we collect, hold, secure, use and share your personal information.

### What is personal information?

As defined by the Privacy Act 1988 (Cth), "personal information" means information or an opinion about an identified individual, or an individual who is reasonable identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Any time we use the term "personal information" in this policy, we are referring to this legal definition of the term.

### What we collect

We collect and hold personal information necessary for our business activities and to enable us to provide the information, goods or services you might be looking for. If we do not collect the information, this might not be possible.

We collect your personal information directly from you when you register as a customer or supplier of ours, interact with us, either in person, over the telephone or electronically (e.g. via our website, social media, by email or SMS) or as otherwise permitted by law.

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The types of personal information we collect include, but are not limited to:

- Name
- Physical and delivery address
- Phone numbers
- Email address
- Banking details and/or credit card information
- ABN, ACN and business name/trading name
- Company details
- Information about your orders and purchases, including what, how and when you buy from us
- We may ask for your ID or an ID reference number when considering whether to sell you goods on credit
- Information collected and held via our secure financial systems about the payment method you use for your purchases from us
- Like many websites, tracking technologies, such as “cookies” are used to obtain certain types of information such as activities, location of device, type and version of your browser, your device ID and other device metrics when you visit our website.

It may be necessary in some circumstances for us to collect sensitive information about you in order to provide specific services or for recruiting purposes. “Sensitive information” is defined in the Privacy Act and includes information like professional memberships. Sensitive information is only obtained with your consent or in certain limited permitted situations.

**Why we collect, hold, use and disclose personal information**

Global will use the personal information it collects for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. Global will not use your personal information for any other purpose without first seeking your consent, or where authorised or required by law.

Global will collect and hold personal information for the following purposes:

- to establish and maintain your relationship with us, including in some cases disclosing your name and address (as required by law, such as to government authorities and agencies) and providing you with information necessary to allow you to remain in contact with us;
- to provide the products or services you have requested from us and keep a record of them;
- to provide credit to you, which may include disclosures to credit reporting agencies or bodies;
- to answer any inquiry you make;
- to register you for events or promotions;
- to assist us to make our services and products more valuable or useful to you;
- to verify your identity and detect fraud activities. We may



conduct monitoring of transactions and financial engagement; or

- any other purpose which is within your reasonable expectation or permitted by law.

Global may disclose your personal information to third parties who work with us in our business to provide, promote or improve the products or services you have requested or are interested in, such as:

- related bodies of Global;
- manufacturers and suppliers;
- couriers and delivery contractors; and
- marketing consultants and promotions companies.

Global may also use and disclose your personal information to send direct marketing to you from Global and its related companies.

The direct marketing may relate to:

- our products and services;
- the products and services of other parties;
- promotions run by us or other parties; or
- to keep you informed of new developments we believe may be of interest to you.

You may opt-out of receiving this direct marketing from us or third parties through the unsubscribe function that will be made available to you with each direct marketing communication.

There are also limited circumstances in which we may share your personal information with third parties, such as:

- financial services organisations when we process your payments;
- specialised service providers for credit applications (when you make an application for credit);
- services helping us to improve our systems;
- couriers and delivery contractors; and
- our legal representatives.

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non personal, de-identified or aggregated information to them for research or promotional purposes.

### **How we collect it**

We collect your personal information from you directly (for example, when we deal with you in person or over the phone), when you send us correspondence (including via email), when you complete a questionnaire, form or survey, when you complete an application for us to supply goods on credit, when you shop with us, including online, or browse our website or when you subscribe to our newsletter or any of our publications.



When you first register on our website, we set a cookie on your computer. We use cookies to make your Global shopping experience easier. It saves you re-entering certain details each time you shop by recording your unique Global customer number. The customer number is then linked with our database that contains the information you supplied to us on registration. Cookies themselves will not tell us who you are.

### **When considering an application for credit**

Under the Privacy Act Global can give a credit reporting agency certain personal information about a customer applying for credit including, but not limited to:

- identity particulars;
- the fact that the customer is applying for credit;
- the fact that Global is a credit provider to the customer;
- whether there is a guarantor guaranteeing the customer's obligations;
- payments which become overdue more than 60 days and for which collection action has commenced;
- advice that payments are no longer overdue;
- in specified circumstances, that in the opinion of Global the customer has committed a serious credit infringement as defined by the Privacy Act;
- that the credit provided to the customer has been paid or otherwise discharged.

If Global considers it relevant to assess the customer's application for credit or the guarantor's creditworthiness or to assist Global in the exercise of its rights against the customer or the guarantor, Global may obtain a report containing personal information about the customer's or the guarantor's personal or commercial creditworthiness, commercial activities, credit standing or credit capacity from any business which provides information about the commercial credit worthiness of persons in accordance with the Privacy Act.

We may give to and seek from a credit provider information about major credit arrangements which may include information about creditworthiness, credit standing, credit history or credit capacity of customers and/or guarantors in accordance with the Privacy Act.

### **Sharing others' information with us**

If you provide us with someone else's personal information, you should only do so if you have their authority or consent to do so. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

### **Storage of Information**

Global holds personal information in hard copy at its offices and in electronic formats. We take security measures to protect the personal information we hold in hard copy (for example physical



measures such as a security system and storage of files in lockable cabinets) and in electronic formats (for example using technology such as restriction of access, firewalls, the use of encryption, passwords and digital certificates). We also have document retention policies and processes.

To access your account information, or to place an order, you must log into your account with Global with your username and password. The combination of these two pieces of information protects you against unauthorised access. We recommend that you change your password regularly.

**Personal Information – Direct marketing**

Global may also use your personal information for the purpose of marketing its services. If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communications, you can click on the unsubscribe function in the communication; or
- for hard copy communications, you can email us through our contact details below.

**Gaining access to personal information we hold**

You can request access to your personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing. Please see our contact details below.

**Keeping personal information current**

If you believe that any personal information Global has collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request correction. To do so, please contact us and we will take reasonable steps to correct it in accordance with the requirements of the *Privacy Act 1988*.

**Complaints**

If you wish to make a complaint to Global about our handling of your personal information, please contact us. You will be asked to set out the details of your complaint in writing.

Global's management will endeavour to reply to you within 30 days of receipt of the complaint and, where appropriate, will advise you of the general reasons for the outcome of the complaint. We may discuss your complaint with our personnel and our service providers and others as appropriate.

In some circumstances, we may decline to investigate the complaint, for example if the complaint relates to an act or practice that is not an interference of the privacy of the person making the complaint. If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.



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**How to contact us** If you have a query in relation to this Privacy Policy or you would like to notify us that you no longer wish to receive marketing material from us, access or correct your personal information or to make a complaint about the handling of your personal information, please contact us as follows:

The Operations Manager  
Global Food and Wine  
PO Box 2922  
NERANG QLD 4211

Email: [goldcoast@globalfw.com.au](mailto:goldcoast@globalfw.com.au)

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**Related Policies** Code of Conduct

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