



**CORNEY &
BARROW**
INDEPENDENT WINE MERCHANTS-1780

Personal information collection statement

As a customer of Corney & Barrow Hong Kong Limited (“**Corney & Barrow**”, “**we**”, “**us**” or “**our**”), it may be necessary for you to provide us with your personal information (“**Personal Data**”) when you apply to us and/or continue to subscribe with us for a service and/or product (“**Services**”). If your Personal Data is incomplete or incorrect, we may not be able to provide or continue to provide the Services to you.

We shall keep your Personal Data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of Personal Data are made in accordance with the laws of Hong Kong and are as set out in this Privacy Statement.

1. What information do we collect about you?

The types of Personal Data that we collect from you may include:

- (a) your name;
- (b) your contact details such as your residential address, email and telephone number;
- (c) your confirmation that you are 18 years old or above;
- (d) your credit card payment details;
- (e) your social media username (if you interact with us through those channels to help us respond to your comments, questions or feedback);
- (f) your IP address (when you visit our website) and URLs of the webpages you have viewed on our website, the frequency of your visits, how long you stay on each webpage;
- (g) your shopping or product preferences and/or transaction history in relation to any Services you have purchased from us;
- (h) any information we collect in any communications we have with you, e.g. email content, customer surveys, etc.; and

It may be necessary for you to provide us with certain Personal Data in order for you to receive the benefits of any Services or for us to respond to your enquiries, complaints or feedback – we will let you know when such Personal Data is mandatory. All other Personal Data provided by you, which we have not indicated as being mandatory, is provided on a voluntary basis.

2. How do we use your information?

You agree that your Personal Data may be used and retained by us for the following purposes and for other purposes as shall be agreed between you and us or required by law from time to time:

- (a) providing the Services, including providing wine storage services, processing and handling any orders, refunds, returns, deliveries, or exchanges;
- (b) responding to, handling, and processing your queries, requests, applications, complaints, and feedback in relation to the Services that you have raised;
- (c) for audit, compliance, controls and other risk management purposes;
- (d) for business management purposes, including data and record management;
- (e) identifying issues with our existing Services; and understanding and improving our Services and operations;
- (f) with your consent, carrying out the marketing activities described in section 6 (Direct Marketing) below;
- (g) processing of any benefits arising out of or in connection with the Services;
- (h) analysing, verifying and/or checking of your credit, payment and/or status in relation to the provision of the Services;
- (i) processing of any payment instructions, direct debit facilities and/or credit facilities requested by you;
- (j) establishing, administering, operating and managing your account set up with us and/or the collection of amounts outstanding in your account in relation to the Services;
- (k) establishing, exercising and/or defending our legal rights; and
- (l) enabling us to comply with our legal, regulatory and reporting requirements to regulatory bodies.

3. Who do we share your information with?

You further agree that we may disclose and transfer (whether in Hong Kong or abroad) your Personal Data for any of the purposes mentioned above, to our parent company, subsidiaries, affiliates and/or branch offices (collectively the "Corney & Barrow Group"), and any of our or any Corney & Barrow Group member's agents, contractors (including, without limitation, service providers who provide warehousing and delivery services, direct marketing companies and mailing houses who help us manage our electronic and mailed communications, IT companies who support our website and other business systems, back office service providers, payment service providers, and data cleansing service providers), any telecommunications operators, any third party collection agencies, any credit reference agencies, any security agencies (including identification verification service providers), any credit providers, banks, financial institutions (including any payment processors), or any professional advisors (including our legal advisors and auditors), any regulatory authorities, courts and other governmental agencies, and any of our actual or proposed assignees or transferees of any part of our business or operations.

Where your Personal Data is shared by us with Corney & Barrow Ltd (a UK company that is a member of the Corney & Barrow Group), your Personal Data will be handled by them in accordance with the Fair Processing Notice found here: [https://www.corneyandbarrow.com/media/wysiwyg/Fair Processing Notice Customer Corney Barrow .pdf](https://www.corneyandbarrow.com/media/wysiwyg/Fair_Processing_Notice_Customer_Corney_Barrow.pdf)

4. Protection of your information

Corney & Barrow maintains appropriate technical and organisational measures to protect your Personal Data. We use security technology for establishing encrypted links to our Corney & Barrow Group members in relation to any transfers of your Personal Data.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security. If you wish to obtain a copy of our IT General Controls, please contact us at the email address or contact number provided below.

5. Your rights

Under and in accordance with the laws of Hong Kong, you have the right to:

- (a) check whether we hold any of your Personal Data;
- (b) access your Personal Data held by us;
- (c) require us to correct any Personal Data which is inaccurate;
- (d) ascertain our policies and practices (from time to time) in relation to Personal Data and the types of Personal Data held by us.

In accordance with the Personal Data (Privacy) Ordinance (Cap. 486 of Laws of Hong Kong), we have the right to charge a reasonable fee for the processing of any Personal Data access request. All requests for access to or correction of Personal Data or information regarding our policies and practices and types of Personal Data held, should be submitted in writing in accordance with the contact details set out in section 8 (*Contact Us*) below.

6. Direct marketing

If you have agreed to receive offers, promotions, newsletters or other promotional and marketing materials from us, then we will use your Personal Data to:

- (a) send you such marketing materials through the post, email, digital media, telephone, text/SMS messaging, our website and online banner advertisements in relation to promotions and events hosted, sponsored or organised by us, and any rewards or discounts, offers, membership, privileges, advantages or benefits offered by us; and
- (b) analyse your preferences and transactional history in order to gain insights, so that we can customise the content and types of promotions, offers, Services and or Marketing Materials we send to you,

each of which shall be in relation to our wine Services.

We will only use your Personal Data for the above marketing purposes if you have consented to such use. You can withdraw your consent **at any time by** contacting us at unsubscribeHK@corneyandbarrow.com

7. Updates to this Privacy Statement

From time to time, we may update this Personal Information Collection Statement and any other relevant policies or procedures. We will notify you of any updates in accordance with your preference settings and, where required by law, will obtain your consent. We will inform you of these changes by emailing you at the email address you provided us, and/or by posting a notice of these changes on our Site.

8. Contact us

Should you have any enquires concerning our Personal Information Collection Statement or if you wish to exercise any of your rights as mentioned above, you can send a written request to

our HR & Administration Manager, Carina Milligan at Unit D, 6th Floor, Nine Queen's Road Central, Hong Kong or at DPOHK@corneyandbarrow.com or call us on +852 2537 3325/+852 3694 3333.