

PRIVACY POLICY

Updated May 25, 2018

This privacy policy (the “**Privacy Policy**”) together with our Terms of Use describes how Enjoy Wine Group Limited (“**EnjoyWine**”) collects, uses and discloses certain information about users (“**you**”), when you use the EnjoyWine website, including www.enjoywine.com, related pages (the “**Site**”) and the services available through the Site (the “**Services**”). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of this Privacy Policy, “**Personal Information**” means information that would allow a third party to learn Your identity and/or contact you, including, for example, your full name, address, telephone number, email address, or credit card information.

WHAT IF I DO NOT AGREE WITH THIS PRIVACY POLICY?

If you do not agree to our processing of your data in the manner described in this Privacy Policy, please do not submit any personal data to us.

By using the Site and/or the Services, You consent to the information collection and use practices described in this Privacy Policy. Your use of Our Site and/or Services and any dispute over privacy are subject to, and governed by, this Privacy Policy and the Terms of Use posted on the Site, including all applicable limitations on damages and the resolution of disputes contained therein. Please read this Privacy Policy carefully to learn about the ways in which we collect, use and protect your personal information.

TYPES OF INFORMATION WE COLLECT

Generally. In using our Site, supplying information, including your likes and dislikes and by making purchases through it you acknowledge that you have chosen to share this information and that it comprises data you have knowingly made available to us. This may include, without limitation: the date and time you visit the Site; the web address or URL you use; technical information about the IP address, browser and the operating system you use and other information about things like your internet service, location, the type (including identifiers) of browser you use, or the pages you visit; and, if you have registered for an account with EnjoyWine, your User Identification, whether from the computer, mobile phone or other device you use to access the Site or Services, including when multiple users log in from the same device.

Specific Information. We may collect the following information about you directly from you, as well as automatically through your use of the Site and/or Services:

Information that you give to us.

This is information about you that you give us when you make an enquiry or engage us to provide services for you, or when you enter information at our website, opt-in/consent forms, apps or by communicating with us by phone, post, e-mail, live chat, social media or otherwise.

The information you give us mainly includes your contact details, identification information, financial or billing information, biographical, employment, and details included in any correspondence and information about you in connection with any matter on which we deliver services to you.

Information about you from other sources.

We may receive information about you from third parties. This can include, your employer as we conduct training. The information that we receive about you from others mainly includes contact information.

Payment Information. If you make a purchase on the Site, we may collect and store your credit card number and other payment information, which will be used only to process your payments.

Automatically-Collected Information. We may track clickstream data, your location information and other data to monitor utilization and to improve customer experience. We use this information to help diagnose problems with our server, administer the Site, analyze trends, track users' movement on our Site, gather broad demographic information for aggregate use in order to improve the Site and Services, and to deliver customized, personalized content. We may use this information in the aggregate, with Personal Information that we have collected about you.

Site Data. We may automatically collect the information about Your use of the Site through cookies, web beacons, and other technologies: Your domain name; browser type and operating system; web pages You view; links You click; searches, including search terms, Your IP address; the length of time You visit the Site and use the Services; the referring URL, or the website that led You to the Site and other actions that You may take on the Site.

HOW WE MAY USE THE INFORMATION WE COLLECT

We may retain and use the information we collect about you for the following reasons:

- To provide our Services, to communicate with You about Your use of our Services, to respond to Your inquiries, to fulfill Your orders, process Your payments and for any other customer service purposes;

- To tailor the content and information that We may send or display to You, to offer location customization, and personalized help and instructions, and to otherwise personalize Your experiences while using the Site or Services;
- To send direct marketing information - ONLY when you have provided your consent;
- To understand how users access and use the Site and Services, both on an aggregated and individualized basis, in order to improve the Site and Services and respond to user requests and preferences;
- To personalize content and to send marketing and other promotional information, including information about jobs and other products and services in which We think You may be interested;
- As necessary to comply with Our legal obligations, resolve disputes, enforce our agreements (including this Privacy Policy and the Terms of Use), to protect or defend Our rights, to investigate, prevent, or take action regarding illegal activities, suspected fraud, and situations involving potential threats to the safety of any person;
- From time to time we may seek your consent to process, use or disclose your information for any other purpose not listed above.
- We only use your information where we have a legitimate interest including:
 - To carry out our conflict checks to ensure that we are able to provide services to you;
 - for prevention of fraud and other criminal activities;
 - to verify the accuracy of data that we hold about you and create a better understanding of you as a client;
 - to manage and deliver projects for business improvement;
 - network and information security in order for us to take steps to protect your personal information against loss or damage, theft or unauthorised access;
 - to comply with a request from you in connection with the exercise of your rights.

DISCLOSURE OF PERSONAL INFORMATION

We do not sell or rent Personal Information to third parties so that those third parties can market their own products or services to you.

Service Providers. We may share Personal Information with contractors and service providers who perform services and functions for the Site, such as credit card processing services, in order to facilitate your use of our Services and the Site.

Legal Process. We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena.

To Protect Us and Others. We also may disclose the information we collect from you if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we may be involved.

Business Transfers. If we are acquired by or merged with another company, if all or substantially all of our business (or a line of business) or assets (or the assets of a line of our business) are acquired by a third party, Personal Information of EnjoyWine users may be one of the transferred business assets. We also may transfer Personal Information in the event of a bankruptcy or reorganization.

Anonymous or Aggregate Information. We may share certain anonymous and/or aggregate information about you, such as your job title, educational history, years of experience, areas of expertise, salary range and other jobs you have applied to, but your name and contact information will not be disclosed in such instances.

SENDING US INFORMATION OVER THE INTERNET

Your information is held on servers hosted by us or our Internet Services Provider. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

USE OF "COOKIES" AND OTHER TRACKING TECHNOLOGIES.

We use cookies and other tracking technologies to collect information about you and your use of the Site and Services, in order to enhance and personalize your experience while using the Site and Services, to track user activities in order to understand how users use the Services, and to improve the Site and Services.

Cookies. Cookies are pieces of information that some websites transfer to your computer, through your web browser, for record-keeping purposes. Use of cookies makes web-surfing easier by performing certain functions such as saving your passwords and your preferences regarding use of the particular website. Cookies also allow us to track your activities at Our Site and provide you with personalized display advertising.

Third Party Cookies. We may also engage third parties to track and analyze Site data. We use the data collected by such third parties to help administer and improve the quality of the Site and to analyze Site usage. Such third parties may combine the information

provided about you with other information that they have collected. This Policy does not cover such third parties' use of the data.

Disabling Cookies. Most web browsers automatically accept cookies, but you can edit your browser options to block them in the future. The "Help" portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or to disable cookies altogether. If you disable cookies, however, the Site may not function properly.

Clear GIFs. We may use clear GIFs to, among other things, track the activities of Site visitors, help us manage Site content, and compile statistics about Site usage. We may tie the information gathered by clear GIFs to users' Personal Information. We and third party service providers may also use clear GIFs in HTML e-mails to Our users, to help Us track e-mail response rates, identify when e-mails are viewed, and track whether e-mails are forwarded.

Local Storage Objects. We may use Flash Local Storage Objects ("Flash LSOs") to store Your Site preferences and to personalize your use of the Site. Flash LSOs are different from browser cookies because of the amount and type of data stored. Typically, Flash LSOs cannot be controlled, deleted, or disabled through a web browser. For more information on Flash LSOs, or to learn how to manage settings for Flash LSOs, go to the Adobe Flash Player Help Page, choose "Global Storage Settings Panel" and follow the instructions. To see the Flash LSOs currently in use, choose "Website Storage Settings Panel" and follow the instructions to review or delete any specific Flash LSO.

Third-Party Analytics. We may use automated devices, programs and/or applications, such as Google Analytics, to evaluate usage of the Site or to evaluate the Services. We use these tools to help improve Services, Site performance and user experiences. We will not share your personal information with these third parties.

CUSTOMER REVIEWS AND USER GENERATED CONTENT

In some instances we may select and post customer reviews or testimonials on our Site which may contain Personal Information such as the customer's name. We will obtain your consent prior to posting the review. Also, in certain parts of the Site, we may invite you to post content on our Site, including your comments, pictures, and any other information that you would like to be available to other users or recruiters on our Site. If you post such content, it will be visible and available to other users of the Site. Your posting may also become part of the public domain and EnjoyWine cannot prevent such information from being used in a manner that may violate this Policy, the law, or your personal privacy.

NEWSLETTERS AND COMMUNICATIONS FROM US

We may send newsletters or other promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the e-mail. You may also opt-out of any of our communications by changing your account settings when sign up to use the Site. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving emails containing newsletters or promotional items, we may still send you emails about your account or any Services you have requested or received from EnjoyWine.

UNSUBSCRIBE

If you would like us to remove your Personal Information, review or other content from our Site, you may contact us at info@enjoywine.com. Please note that copies of information that you have updated, modified or deleted may remain viewable in cached and archived pages of the Site for a period of time. You may request that we: (1) update or correct your personal information, (2) change your preferences with respect to communications and other information you receive from us, or (3) delete the personal information maintained about you on our systems (subject to our data retention policies, described in the following section). Such updates, corrections, changes, and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Statement prior to such update, correction, change or deletion.

To protect your privacy and security, we may take reasonable steps (such as requesting a unique password) to verify your identity before granting you profile access or making corrections. You are responsible for maintaining the secrecy of your unique password and account information at all times.

We will implement your request as soon as and to the extent reasonably and technically practicable. We may not be able to honor all requests when personal information must be retained for business purposes or to comply with applicable law.

THIRD PARTY WEBSITES

Our Site may contain links to other websites. Please note that when you click on one of these links, you are entering another website over which www.enjoywine.com has no control and will bear no responsibility. Often these websites require you to enter your Personal Information as you apply for a job directly with the hiring company. We encourage you to read the privacy statements on all such websites as their policies may differ from ours.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is current as of the Updated Date set forth above. We may change this Privacy Policy from time to time, so please be sure to check back periodically.

CONTACT US

If you have questions or concerns regarding this Privacy Policy, you should contact us at: info@enjoywine.com.